

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DAVID R. FRONK
(DFC/USPS-T32-8-9)

August 4, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness David R. Fronk.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

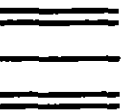
Dated: August 4, 1997



DOUGLAS F. CARLSON

DFC/USPS-T32-8. For the following questions, please redirect the questions if necessary if you are unable to answer them.

- a. Please confirm that I, Douglas F. Carlson, am an individual.
- b. Please refer to the envelopes labelled "1" and "2" that are pictured in Attachment 1 to DFC/USPS-T32-8. The envelopes are printed on regular envelope stock. Please confirm that the envelopes appear to be automation-compatible.
- c. If you do not confirm in (b), please explain all respects in which these envelopes appear not to be compatible with automation.
- d. Are you aware that Microsoft Word 6.0 is a word-processing program that is commonly used by individuals?
- e. Are you aware that the envelope labelled "2" in Attachment 1 to DFC/USPS-T32-8 could be printed using standard options in Microsoft Word 6.0?
- f. Please explain fully the basis for your statement in your response to DFC/USPS-T32-4(c) that "individuals do not prepare mail that is automation-compatible as the term is used in the PRM proposal[.]"
- g. If I, as an individual, printed the envelope labelled "2" in Attachment 1 to DFC/USPS-T32-8 using Microsoft Word 6.0, would you still claim that "individuals do not prepare mail that is automation-compatible as the term is used in the PRM proposal"?
- h. Does the Postal Service benefit when a person mails a letter with a typewritten, OCR-readable address instead of a handwritten address that requires the assistance of a Data Conversion Operator via the RBCS system to apply a bar code?



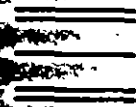
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WALNUT CREEK CA 94596-0562



1

Douglas F. Carlson
PO Box 12574
Berkeley CA 94712-3574

2



DOUGLAS F. CARLSON
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BERKELEY CA 94712-3574

DFC/USPS-T32-9. Please provide an answer to DFC/USPS-T32-7. I am asking you, as an expert witness, to assume that the problems associated with a discounted rate did not exist or could be eliminated. If you cannot answer this question, please redirect it to a witness who can or to the Postal Service. Otherwise, please ask your counsel to file an objection stating the legal grounds underlying the Postal Service's inability to answer the question.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and section 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

August 4, 1997
Emeryville, California