

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997)
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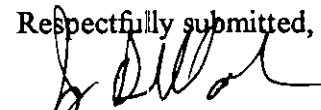
Docket No. R97-1

INTERROGATORIES OF THE
AMERICAN BANKERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS DAVID R. FRONK
(ABA/USPS-T32-3-4)

August 18, 1997

Pursuant to sections 25 and 25 of the Rules of Practice of the Postal Rate Commission, American Bankers Association (ABA) directs the following interrogatories to United States Postal Service witness Fronk (USPS-T32). If witness Fronk is unable to respond to any interrogatory, we request that the interrogatory be redirected to an appropriate person capable of providing a response.

Respectfully submitted,



Irving D. Warden

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1120 Connecticut Avenue, N.W.
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(202) 828-4548 - fax

ABA/USPS-T32-3-4

ABA/USPS-T32-3.

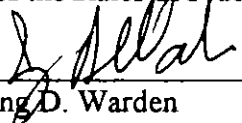
On page 20 of your testimony, lines 16-22, you discuss the rationale for using bulk metered mail as a benchmark for worksharing discounts in First Class. Please provide annual historical data from 1975 through 1996 on the volume of bulk metered mail.

ABA/USPS-T32-4.

Please confirm that in the last rate case, R94-1, the Commission did not set worksharing discounts on the basis of the Postal Service's "cost avoidance" methodology, but instead relied on its own "cost difference" methods.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the following document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Irving D. Warden

August 18, 1997