

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS O'HARA
TO INTERROGATORY OF UNITED PARCEL SERVICE
AND MOTION FOR LATE ACCEPTANCE
(UPS/USPS-T30-6)**

The United States Postal Service hereby files the response of witness O'Hara to the following interrogatory of United Parcel Service, dated August 4, 1997:

UPS/USPS-T30-6.

The interrogatory is stated verbatim and is followed by the response.

The response was due to have been filed on August 18, 1997. It was not possible to file it on that date because it depended on reference to an exhibit that has been in the process of being revised. The revised exhibit has been finalized and is being filed today, making a response to UPS/USPS-T30-6 possible. The Postal Service regrets this unavoidable delay and moves for late acceptance of this response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

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August 22, 1997

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF THE UNITED PARCEL SERVICE**

UPS/USPS-T30-6. In Exhibit USPS-30G, you show the total TY1998(AR) volume for First Class Cards to be 4,940,041. In USPS-T-41, at Exhibit USPS-41B, witness Takis indicates that the volume for First Class Cards is 5,523,046. Please explain this discrepancy.

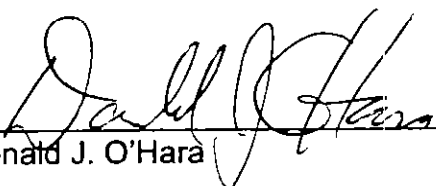
RESPONSE:

My Exhibit USPS-30G is incorrect; the stamped card volume of 583,005 was inadvertently omitted. A revised exhibit is being filed today (August 22, 1997). Note also that the stamped card volume was correctly included in my WP II, which feeds into my Exhibit USPS-30B.

DECLARATION

I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

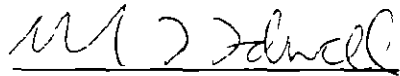
8-22-97
Date



Donald J. O'Hara

CERTIFICATE OF SERVICE

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

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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August 22, 1997