

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

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DAVID R. FRONK  
(OCA/USPS-T32-57-108)  
September 2, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

In addition, please note that in some interrogatories herein we request the submission of interviewer notes which may exist as part of the report contained in LR H-226. For purposes of this set of interrogatories, when we refer to "interviewer notes" this means we are requesting summaries, transcriptions (whether verbatim or not), and separate notes taken contemporaneously by the interviewer during the interview. We are not at this time requesting actual audio tapes. Alternatively, the

Postal Service may find it more convenient to supply all interviewer notes relating to the report, which would obviate responding to the individual requests for such notes that appear herein.

Finally, various interrogatories refer to "CEM." This is the Courtesy Envelope Mail proposal advanced by OCA in Docket No. MC95-1.

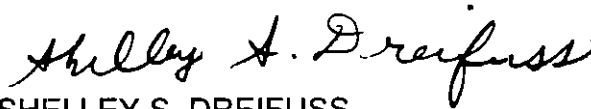
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T32-57. Please refer to LR H-226, "Qualitative Market Research - Prepaid Reply Mail Product Concept In-Depth Interviews with Businesses - Final Report," ("report") dated May 2, 1997.

- a. Confirm that Price Waterhouse authored the report. If not confirmed, please explain.
- b. Does the Postal Service plan to introduce the report as part of its testimony in this docket? If not, why not? If so, who will sponsor it?
- c. Please supply all documents not already provided as part of LR H-226 relating to giving instructions or guidance for preparation of the report, including, but not limited to, instructions or guidance to the author for preparing the study methodology, for conducting the study, and for writing the report's conclusions.

OCA/USPS-T32-58. The report discusses two PRM variations, implicit and explicit. See Appendix B, page 3. Implicit PRM "would be treated in a similar fashion as the current approach to BRM." Explicit PRM is said to involve the direct billing of clients for the use of the prepaid reply mail envelope. Appendix B at page 4. See also Appendix D, page 2.

- a. Confirm that explicit PRM is not part of the current Postal Service proposal in this docket. If not confirmed, please explain.
- b. Confirm that implicit PRM as defined in the report encompasses the Prepaid Reply Mail ("PRM") and Qualified Business Reply Mail ("QBRM") proposals in this docket. If not confirmed, please explain.

- c. If (a) is confirmed, why did the Postal Service not offer such a proposal in this docket?

OCA/USPS-T32-59. At page 10 of the report it is stated that telephone interviews were conducted with interviewees; these interviews were audio recorded to facilitate analysis.

- a. Please clarify whether the audio tapes still exist.
- b. Were the audio tapes transcribed or summarized in any form? If transcriptions were made, were the transcriptions verbatim? Please explain.
- c. Did the interviewer(s) take separate notes? Please explain.
- d. Were the notes in (c) later transcribed or edited? Please explain.

OCA/USPS-T32-60. Please refer to Appendix D, page 1 of the report, entitled "Pre-Interview materials." Is this the "two page summary about the product concept" sent to interviewees, as referred to in Appendix C, page 3? If not, please explain.

OCA/USPS-T32-61. The pre-interview materials contain the following paragraphs:

*At present, households need to obtain and affix a stamp to courtesy reply envelopes or plain "white" envelopes. Thus, the advantages for households include convenience and savings in mailing costs, depending on how the product is priced. Consumer interest may also depend on whether the household pays the postage explicitly or implicitly, as discussed below.*

*For businesses, the advantages include faster return of remittances because households won't have to delay mailing in their payment due to the lack of a stamp, and potential "good will" among customers who believe that returning the envelope is "free" or who understand that their remittances are traveling at a reduced postage rate. [emphases supplied.]*

- a. Do the italicized portions of the pre-interview materials sent to interviewees infect the results with bias, perhaps leading the interviewees to be predisposed in favor of the proposals discussed with the interviewer? Please explain.
- b. Please explain if you do not agree there is a bias problem, with reference to survey literature indicating that statements such as those italicized are appropriate in surveys.

OCA/USPS-T32-62. Page 9 of the report states: "Potential interviewees were identified by calling a variety of businesses thought to include prepaid envelopes, such as a BRM envelope, a Prepaid Meter Reply envelope, or any form of reply mail that has a pre-applied stamp indicia, with the bill statements sent to consumers."

- a. Please set forth all forms of reply mail that have "pre-applied stamp indicia."
- b. Please set forth all regulations relating to the content, existence, and placement of any such "pre-applied stamp indicia."

OCA/USPS-T32-63. The report at pages 9-10 indicates that within each of the organizations interviewed, a manager responsible for the overall management or supervision of bill payment options, particularly mail payment options, was identified.

- a. Please supply the names, positions, phone numbers, and organization names for all persons interviewed for this report. OCA will agree to appropriate confidentiality provisions regarding such information.

- b. Please refer to Docket No. MC95-1 and OCA's Courtesy Envelope Mail ("CEM") proposal. Please indicate whether the Postal Service would be amenable to furnishing the persons described in (a) with a questionnaire concerning CEM prepared by OCA. If not, why not?
- c. Pages 10-11 of the report describe the challenges associated with finding and then contacting the right person responsible for managing mail payment options. How many hours did the persons conducting the report require to identify and then successfully contact such persons?

OCA/USPS-T32-64. At page 11 the report states that the "difficulties encountered in identifying and contacting potential interviewees required the expansion of the interviewee criteria to include organizations that do not currently include a postage prepaid envelope with their bill statements, but rather include a courtesy reply mail (CRM) envelope. The methodological change was approved by the USPS."

- a. Did the Postal Service want to limit the original interview process only to, essentially, BRM mailers? If so, why? If not, please explain.
- b. According to page 11 of the report, there were three interviews with current BRM users. Does this mean that the Postal Service was able to find only three BRM users in the entire United States? Please explain.
- c. Were any current BRM users not considered or rejected for interviewing? If so, please explain.
- d. Were current CRM mailers originally not considered suitable for being interviewed? Please explain.

- e. Did the Postal Service believe prior to the interview process that current CRM mailers would not be attracted to the two proposals under discussion in the report? Please explain.
- f. As noted, on page 11 the report states that the methodological change was approved by the Postal Service. Please submit all documents relating to such approval, including, but not limited to, all documents relating to the need for such a change.
- g. The report at page 11 states that the findings in the report are not intended to be statistically representative, reflecting the data gathered from the interviews. Did the Postal Service ever consider, or even plan, a survey that it believed would obtain statistically representative results? If so, explain. If not, why not?

OCA/USPS-T32-65. At page 10 of the report it is stated that: "Estimates indicate that only approximately 5% of the envelopes enclosed with bills are prepaid." Please describe the empirical basis for this assertion, including any information the Postal Service gave to the report's author.

OCA/USPS-T32-66. Please set forth all reasons why mailers who currently use BRM and CRM will be attracted to PRM and QBRM that are not set forth in your testimony.

OCA/USPS-T32-67. On page 10 of the report, it is stated: "The identification of potential interviewees was extremely challenging. The number of organizations currently including a prepaid postage envelope in their bill statements is quite low."

- a. Do you agree with the "quite low" characterization?
- b. If so, set forth all reasons why the number is "quite low?"
- c. If not, please explain.

OCA/USPS-T32-68. Please describe all auditing performed by the Postal Service to ensure that BRM users comply with BRM requirements. In your description, include any databases that contain the identities of such mailers specifically as BRM users.

OCA/USPS-T32-69. At any point in the interview process used to compile the report did the interviewers raise the possibility of an option identical or similar to the CEM proposal advanced by OCA in Docket No. MC95-1?

- a. If not, why not?
- b. Did you or the Postal Service believe prior to the interview process that interviewees might favor a CEM-type proposal? Please explain.

OCA/USPS-T32-70. Please refer to page 20 of the report, and the following quotations:

(1) "The utility company and the publishing company both using BRM felt very strongly that they received their payments faster [using BRM], thereby enhancing their cash flow." (2) "The publishing company and executive business journal both indicated that they send multiple reminders, invoices, and BRM envelopes to a single customer for renewal and payment of subscriptions." (3) "These interviewees felt that their customers did not perceive any urgency to submit their payments, and the receipt of a single BRM is not necessarily sufficient to entice customers to pay their bills



immediately.” (4) “This interviewee [referring apparently to the “publisher” in the preceding sentence] felt that customers simply did not pay their bills until they were due.”

- a. Which interviewee is being referred to in (4)?
- b. Is there a contradiction between the statement in (1) and the other statements?  
Please explain.

OCA/USPS-T32-71. Please refer to page 21 of the report.

- a. The report states: “The current users of CRM for bill payment indicated that they do not offer BRM primarily because of the cost.” Why will current users of CRM use the proposed PRM and QBRM systems? Provide any explanation not currently provided in your direct testimony.
- b. Assume a utility sends out 100,000 bills a month to its 100,000 customers. Compare the postage costs the utility would incur using: (1) current CRM, (2) current BRM, (3) proposed PRM, (4) proposed QBRM, and (5) CEM.

OCA/USPS-T32-72. At page 21, the report states: “As described by one utility company currently using CRM, utility companies must be concerned about serving their customers; however, the nature of their business is such that their customers **must** pay their bills one way or another, or their utility service will be discontinued. There was little incentive for this utility company to offer BRM.”

- a. Why would there be any incentive for any utility to offer BRM? The proposed PRM? The proposed QBRM?

- b. Why would there be any incentive for a credit card company (which typically requires at least a monthly minimum payment) to offer BRM? The proposed PRM? The proposed QBRM?

OCA/USPS-T32-73. The report at page 21 states, with reference to the utility: "The issues related to regulation of rate structures among utility companies was also identified as a barrier to using BRM, as any changes to the rate required to cover the costs of offering BRM would require justification to the commissioner."

- a. Please comment as to whether this assessment is correct, and whether it would apply to most or all utilities generally.
- b. Please comment whether this assessment would apply to most or all utilities generally for CRM, the proposed PRM, the proposed QBRM, and CEM.

OCA/USPS-T32-74. At page 21 of the report it is stated that "Bank 2 (current CRM user) considered introducing BRM, however it was deemed far too costly to use."

- a. Please supply the interviewer's notes relating to this statement.
- b. What was meant by "far too costly?"
- c. Do you believe that the opinion of Bank 2 would apply to some, all, or most banks?
- d. Why would a bank ever want to use BRM? The proposed PRM? The proposed QBRM?

OCA/USPS-T32-75. Refer to page 21 of the report. Did the representative of the insurance company currently using CRM explain in any more detail why there had never been a concerted attempt within the organization to investigate the potential of using BRM?

OCA/USPS-T32-76. Please refer to page 22 of the report where it states: "There were, however, some areas [of the current BRMAS accounting system] that could be improved. " The remaining three sentences in that paragraph report problems with BRMAS accounting.

- a. Please comment on the reported problems. Are the allegations correct? If not, why not?
- b. Have any reports or other summaries about accounting problems with BRMAS been prepared by the Postal Service or its consultants or contractors within the last five years? If so, please submit all such reports. If not, why not?
- c. What is being done to improve the BRMAS accounting system? Please describe. If any report or summary exists about such improvements, please supply it.

OCA/USPS-T32-77. How will accounting systems currently in place for BRM be improved for the proposed QBRM, and for the proposed PRM?

OCA/USPS-T32-78. Please refer to page 23 of the report. It is stated: "While there was some discussion regarding the current price of BRM, as well as the potential

impact that BRM has on the speed with which they are able to receive and process payments, the general view is that BRM seems to work for their organizations.”

- a. Please provide the interview notes which form the basis for this sentence.
- b. What was “the discussion” regarding the current price of BRM? Please describe.
- c. What was the “potential impact that BRM has on the speed with which they are able to receive and process payments?” Please describe.

OCA/USPS-T32-79. Please refer to page 23 of the report. It is stated: “Many indicated that the inclusion of a CRM envelope ensured that the bill payment was sent to the correct address, and simplified processing due to uniform envelope size.”

- a. How does CRM ensure that bill payments are sent to the correct address?
- b. Would this be true of CEM also, assuming the courtesy reply envelope is certified by the Postal Service?

OCA/USPS-T32-80. Please refer to page 25 of the report where it is stated: “The other interviewees did not perceive PRM as an incentive to keep customers from using alternative forms of payment.”

- a. Why not? Please set forth the full reasoning of the interviewees on this topic.
- b. Please provide the interviewer notes on this topic.

OCA/USPS-T32-81. Please refer to pages 25-26 of the report. It is stated: “They were somewhat less enthusiastic of a potential new product which would require significant

changes to their current BRM process; however, they were uncertain as to the other potential benefits of PRM over BRM, aside from the reduced rate.”

- a. Why were they “somewhat less enthusiastic?” Please set forth the full reasoning of the interviewees on this topic.
- b. Please provide the interviewer notes on the topic discussed in (a).
- c. Why were they uncertain as to the other potential benefits of PRM over BRM (aside from the reduced rate)?
- d. Please set forth the full reasoning of the interviewees on this topic.
- e. Please provide the interviewer notes on the topic discussed in (c).

OCA/USPS-T32-82. Please refer to page 26 of the report where it is stated: “The general reaction of the utility companies was that while the [PRM] concept is appealing as a potential service to customers, they would probably never use it because they would have to be able to recoup the cost through the cost of their product or service.”

- a. Please comment on whether CEM would be more appealing to utility companies having the views expressed above.
- b. Please explain why you did not discuss the quoted statement from page 26 of the report when you offered your volume estimates for PRM on pages 42-44 of your direct testimony.
- c. Please explain how the quoted statement on page 26 of the report is consistent with your estimation on page 43 of your direct testimony that an estimated “500 million pieces of courtesy reply envelope mail” might shift to PRM.

- d. Please explain how the statement on page 26 of the report is consistent with the statement on page 43 of your direct testimony that there are two industries likely to be attracted to the PRM rate, credit card companies and utilities.

OCA/USPS-T32-83. Please refer to page 26 of the report. There it is stated: "The regulations surrounding the rate structures of different utilities would appear to inhibit the attractiveness of PRM."

- a. Please set forth the full reasoning of the interviewees on this topic.
- b. Please provide the interviewer notes on the topic discussed in (a).

OCA/USPS-T32-84. Please refer again to page 26 of the report where it is stated: "Implicit PRM would require a rate change, which is not attractive . . . ."

- a. Please set forth the full reasoning of the interviewees on this topic.
- b. Please provide the interviewer notes on the topic discussed in (a).

OCA/USPS-T32-85. Please refer now to page 27 of the report where it is stated: "A representative from Bank 1 indicated that the bank was not interested in this type of product due to additional administrative burden for the bank to build in the cost of postage into the cost of their product . . . ."

- a. Was Bank 1 in this context referring to implicit PRM? Please clarify.
- b. Would you characterize implicit PRM as defined in the report as substantially similar to both the PRM and QBRM proposals in this docket? If not, why not?

- c. Please set forth the full reasoning of Bank 1 on the quoted statement set forth above.
- d. Please provide the interviewer notes on the topic addressed in the above-quoted statement.

OCA/USPS-T32-86. Please refer to page 27 of the report where it is stated: "They therefore anticipated that the PRM product would slow down the process." The process apparently refers to use of lock box vendors to process incoming CRM. If this assumption is not correct, please clarify.

- a. Why would PRM slow down this process?
- b. Please explain the use of lock box vendors by mailers to process CRM.
- c. Could such vendors process incoming mail under the CEM proposal as easily as the current CRM system? If not, why not?

OCA/USPS-T32-87. Please refer to page 28 of the report under the heading "Current CRM users." It is stated: "Current CRM users were most concerned with the cost of Implicit PRM." "The utility companies discussed the need to justify all of their costs to a regulatory board or commissioner. The components of these costs usually apply to all of their customers and, because it is not anticipated that PRM would be used by all customers . . . interviewees anticipate significant challenges charging everyone for something that only a select group will likely use."

- a. Please set forth the full reasoning of the interviewees on this topic.

- b. Please provide the interviewer notes on the topic discussed in (a).

OCA/USPS-T32-88. Please refer to the report on page 28 where it is stated: "The banks and the security and insurance companies indicated that they have already eliminated their annual fee because of competitive pressure, and there isn't really any room to add fees to the interest rate, which is also very competitive."

- a. Please set forth the full reasoning of the interviewees on this topic.
- b. Please provide the interviewer notes on the topic discussed in (a).

OCA/USPS-T32-89. Please refer to page 28 under the heading "Other concerns."

There it is stated: "there was concern that the reduced rate may have an impact on the cost/quality of service for the mail that the businesses send to their customers or the quality of service currently received from USPS for incoming bill payments. The issue related to how USPS would introduce this product at a lower rate. Would USPS' costs be covered by better efficiencies or by increasing the cost of sending outbound mail or decreasing service to mailers? These interviewees were also concerned about the timing of the process, 'Will this slow the process down?' The publishing company viewed this as a current problem with BRM."

- a. Please comment on the validity of these concerns.
- b. Please set forth the full reasoning of the interviewees on these topics.
- c. Please provide the interviewer notes on these topics.



OCA/USPS-T32-90. Do you consider the evidence and findings of the report probative on the issue of likelihood that existing CRM users will switch to PRM? Please explain.

OCA/USPS-T32-91. Were you aware of the report (specify either its existence or its contents) when you prepared your testimony? Please explain.

OCA/USPS-T32-92. If you were aware of the report, why did you not mention it?

OCA/USPS-T32-93. Did any person from the Postal Service (excluding lawyers) recommend to you or tell you not to refer to the report? If so, who? If so, what reasoning did they give?

OCA/USPS-T32-94. On page 43 of your direct testimony, you develop a partial estimate of mailers who would switch to PRM from CRM based on experience following the introduction of barcodes, qualifying your comparison by stating it was "not a perfect parallel by any means." You state, however, that "experience with this postal product [barcodes] provides some insight into the potential for PRM and how initial business resistance can be overcome."

- a. Why would businesses resist switching to PRM?
- b. Do you find any valid statements in the report suggesting there might be business resistance to PRM? If so, which ones? And, if so, why are the statements valid?

OCA/USPS-T32-95. Please refer to page 44 of your direct testimony where you state: "Because of the uncertainty in this 360 million piece estimate of mail switching from courtesy reply envelope mail to PRM (280 + 80 million), and, therefore, the uncertainty in the range around a point estimate, I increased the estimate to 500 million pieces."

- a. What do you mean by the phrase "uncertainty in the range around a point estimate?"
- b. Why did you increase the estimate, given the negative opinions about PRM expressed in the report?
- c. Would it not have been better to *decrease* the estimate? Please explain.
- d. You further state on page 44 of your direct testimony that the estimate "is conservative as it is a hedge against the revenue loss associated with a higher than anticipated acceptance of PRM." Is it correct to state that if PRM usage is less than your estimate then the Postal Service will enjoy greater revenues than you anticipate? Please discuss.

OCA/USPS-T32-96. Please refer to page 36 of your direct testimony where it is stated: "The proposed PRM rate can help address the threat of electronic diversion and, at the same time, provide added convenience to the general public." Please now refer to page 29 of the report where it is stated: "BRM users, in general, did not think that their customers would change their bill payment habits as a result of the introduction the [sic] implicit variation of PRM."

- a. Please reconcile the statement on page 36 of your direct testimony with the statement on page 29 of the report.
- b. At page 30 of the report the following is stated: "The representative from the insurance company did not think that PRM would be enough to entice customers to switch from pre-authorized debit back to the mail, nor would it change the volume of in-person payments." Please comment on this statement.

OCA/USPS-T32-97. At page 30 of the report the following is stated: "Overall, the CRM users indicated that even if this type of product was offered to their customers, it would probably not affect mail volume."

- a. Clarify what version of PRM is being talked about here.
- b. If it is a type of PRM being proposed in this docket, please comment vis a vis your volume estimates.

OCA/USPS-T32-98. Please refer to Section 6.0 of the report, beginning at page 34.

Current BRM and PRM users were asked to express their level of interest in the implicit variation of PRM at different price levels. See Exhibit 3.

- a. The report uses the phrase "fully loaded postage." Confirm that this term was explained to the interviewees to mean "that all fees (if any) are already included in the price." See Appendix B, page 3. If not confirmed, please explain.
- b. The questionnaire asked the interviewees to comment on implicit PRM at three fully loaded price levels: 32, 29 and 27 cents. Please quantify the fees interviewees would have been considering as part of the fully loaded price.

- c. Confirm that interviewees were being asked to react to these price levels vis a vis the current level of postage fees. If not confirmed, please explain.

OCA/USPS-T32-99. Current BRM users were asked to consider implicit PRM at a 32 cents per-piece fully loaded price. Given the mail volume profile of the BRM users in the interview, what would their current fully loaded BRM postage price have been?

OCA/USPS-T32-100. Current CRM users were asked to consider implicit PRM at a 32 cents per-piece fully loaded price. Given the mail volume profile of the BRM users in the interview, what would their current fully loaded postage price have been?

OCA/USPS-T32-101. Please refer to page 23 of the report where there is a reference to "[t]he three businesses currently using BRM interviewed as part of this research . . . ." See also Exhibit 1, page 14, listing a utility company, a publishing company, and an executive business journal as the only three BRM users.

- a. Confirm that the report covered three BRM users. If not confirmed, please explain.
- b. Please now refer to Exhibit 3 at page 34, where apparently five interviewees are said to be current BRM users. Please reconcile these exhibits and statements.

OCA/USPS-T32-102. Please refer to page 35 of the report where it is stated: "While these interviewees [current CRM users] indicated that reduced rates were positive if

they could be passed along to their customers, the overall cost of introducing this product was viewed as prohibitive.”

- a. Reconcile this statement with the projected volume estimates in your direct testimony.
- b. What costs would they have viewed as being prohibitive? Please quantify.
- c. Please comment on the validity of the interviewees’ concerns.
- d. Please set forth the full reasoning of the interviewees on these topics.
- e. Please provide the interviewer notes on this topic.

OCA/USPS-T32-103. Please refer to Appendix A of the report, pages 3-4. The following questions were asked interviewees about implicit PRM. Question 8 asks, in part: “What barriers exist to your organization using this product?” Question 10 asks, in part: “What are you not interested in [sic] this version of the product?” Please provide the interviewer notes on the responses to these questions.

OCA/USPS-T32-104. At page 35 of the report it is stated: “The representative from the long distance communication company indicated that they might be interested in investigating this product if the price were 26 cents per piece, which is the current price they are paying to send their mail from their business to customers.”

- a. At the proposed 30 cents per-piece price proposed in this docket for PRM and QBRM, and assuming all other rate and service proposals in this docket are adopted (including associated PRM and QBRM fees and qualifications), please provide a quantitative profile of companies that might switch from CRM to PRM

or QBRM, e.g., the mail volume that would be necessary to make the change worthwhile.

- b. Please quantify or estimate transaction costs a company considering switching from CRM to PRM or QBRM would incur (except for fees paid to the Postal Service). For example, such transaction costs might include costs of reprinting envelopes, sending notices to customers, and administrative costs. Explain the derivations of all quantifications and estimates used.

OCA/USPS-T32-105. Please refer to page 35 of the report where it is stated: "Overall, CRM users were not very interested in the implicit version of PRM, even at different price levels." "At 27 cents, only two of the seven CRM businesses indicated any level of interest above low." At page 40, the report concludes: "The price of the implicit variation of PRM would prohibit current CRM users from introducing this product. Current CRM users, while interested in the implicit PRM product conceptually, indicated that the cost is prohibitive, even at 27 cents."

- a. Reconcile these statements and findings with the projected volume estimates in your direct testimony.
- b. Given these statements and findings, why did the Postal Service propose PRM and QBRM?

OCA/USPS-T32-106. Please refer to the OCA's Courtesy Envelope Mail ("CEM") Proposal in Docket No. MC95-1.

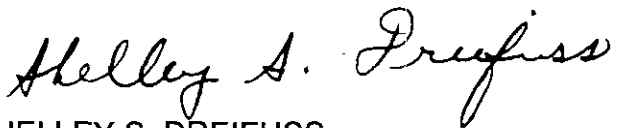
- a. Please list all reports, studies, and surveys (whether or not in final form) relating to the CEM proposal, or to any proposal substantially similar to the CEM proposal, of which you are aware.
- b. Please supply the documents meeting the definition in (a) if such documents have not already been submitted to the Commission in this proceeding.
- c. Please list all pending proposals for reports, studies, and surveys (whether or not in final form) relating to the CEM proposal, or to any proposal substantially similar to the CEM proposal, of which you are aware.

OCA/USPS-T32-107. Please list all documents, including, but not limited to, internal memoranda, reports, studies, and surveys (whether or not in final form) that you consulted, or relied upon in whole or in part, in the preparation of your testimony.

OCA/USPS-T32-108. Please supply all reports, studies, and surveys (whether or not in final form) that you consulted, or relied upon in whole or in part, in the preparation of your testimony.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
September 2, 1997