

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 THE UNITED STATES POSTAL SERVICE  
(OCA/USPS-15-20)  
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.

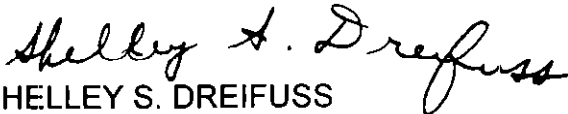
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-15. 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 this library reference was filed with the Commission on August 18, 1997, that it was not submitted with the Postal Service's Request in this docket, and was only submitted in response to Presiding Officer's Information Request No. 1. If not confirmed, please explain.
- b. Please explain why the Postal Service commissioned the report and the underlying set of interviews.
- c. Did the Postal Service anticipate when it commissioned the report that the results of the report would be submitted with the Postal Service's Request that forms the basis of this proceeding? Please explain.
- d. Please submit all documents relating to (b) and (c) herein.

OCA/USPS-16. Please refer to the set of interrogatories filed on September 2, 1997, to Postal Service witness Fronk, OCA/USPS-T32-57-105.

- a. Comment on the proposition that many of the statements and findings in the report indicate a negative prognosis for mailer acceptance of implicit PRM (as implicit PRM is defined in the report).
- b. Comment on the proposition that many of the statements and findings in the report indicate a negative prognosis for mailer acceptance of the Postal Service's

Prepaid Reply Mail ("PRM") and Qualified Business Reply Mail ("QBRM") proposals in this proceeding.

OCA/USPS-17. Please describe all reports, studies and surveys commissioned by the Postal Service on or after July 1, 1996, that have not been filed in this docket.

- a. List the title of all such reports, studies, and surveys, a description of their purpose, and the completion dates (or expected completion dates) of such reports, studies, and surveys.
- b. From the list in (a) indicate all that were commissioned for the purpose or potential purpose of submitting them in this docket.
- c. Submit all reports, studies and surveys that conform to the description in (b).

OCA/USPS-18. Please describe the policy of the Postal Service with regard to submitting reports, studies, and surveys in a proceeding, where such reports, studies, and surveys contain statements and findings that are adverse or potentially adverse to the Postal Service's position in a proceeding.


OCA/USPS-19. Please describe the policy of the Postal Service with regard to the retention of reports, studies, and surveys, where such reports, studies, and surveys contain statements and findings that are adverse or potentially adverse to the Postal Service's position in a proceeding.

OCA/USPS-20. 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.
- 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.

#### 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