

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

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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 CARL G. DEGEN
(OCA/USPS-T12-40-42)
September 5, 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.

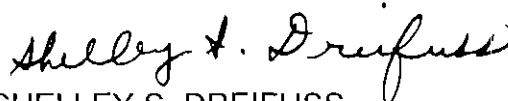
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T12-40. This interrogatory follows up on your response (September 2, 1997) to question 2 of POIR No. 2. The premise for question 2 was that, "In Docket No. R94-1, the Commission concluded that as the processing of library rate and special rate pieces should be similar, data showing that the attributable costs for these two subclasses were similar was not surprising."

- a. Please confirm that the processing of library rate and special rate pieces is similar. If you do not confirm, please explain, in detail, your disagreement with this premise.
- b. If you do confirm in part a. that library rate and special rate pieces are processed in a similar manner, then confirm that it would be reasonable to expect the attributable costs for the two subclasses to be similar.
- c. In your response to question 2 you state that "the operating plan does not segregate Library rate mail from Special rate mail."
 - i. What is the "operating plan?"
 - ii. Why is it significant that the "operating plan" does not segregate Library and Special rate mail?

OCA/USPS-T12-41. Describe the overall composition of Library rate mail.

- a. Include in your description the types of individuals and organizations that send Library rate mail.
- b. Include in your description the types of individuals and organizations that receive Library rate mail.
- c. Who are the predominant senders of Library rate mail?

- d. Who are the predominant recipients of Library rate mail?
- e. Are the mail pieces carried in the Library rate mail stream almost exclusively books? Please explain. Estimate what percentage of the mail stream consists of books.
- f. What other types of items (e.g., compact discs or tapes) comprise a significant percentage of the Library rate mail stream. Please estimate this percentage (or percentages).
- g. Do library rate mailings tend, primarily, to be transported over short distances, e.g., from one branch of a library system to another or between a library branch and its local patrons? Please explain in detail.
- h. Is it correct that publishers are no longer permitted to mail books purchased by libraries as Library rate mail? If this is not correct, please explain. If this is correct, when and how was this change effected?

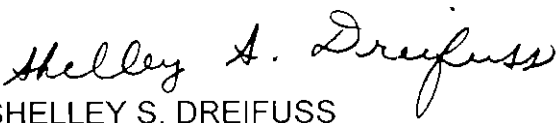
OCA/USPS-T12-42. Describe the overall composition of Special rate mail.

- a. Include in your description the types of individuals and organizations that send Special rate mail.
- b. Include in your description the types of individuals and organizations that receive Special rate mail.
- c. Who are the predominant senders of Special rate mail?
- d. Who are the predominant recipients of Special rate mail?

- e. Are the mail pieces carried in the Special rate mail stream mostly compact discs and tapes? Please explain. Please estimate what percentage of the mail stream consists of compact discs and tapes.
- f. What other types of items (e.g., books) comprise a significant percentage of the Special rate mail stream? Please estimate this percentage (or percentages).
- g. Do single-piece Special rate mailings tend to exhibit nationwide mailing patterns, i.e., individuals who do not wish to purchase compact discs, tapes, books, etc., return them to publishers, record clubs, etc. via Special rate fourth class? Further, is there any reason to believe that customers returning tapes, compact discs, books, etc. are necessarily located in the same region as distributors? Please explain in detail.
- h. Please contrast the kind of mail typically sent as single-piece Special rate with that sent as bulk-rate Special rate. Include in your description the typical senders and recipients of each.

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 5, 1997