

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**REVISED RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS FRONK  
TO INTERROGATORIES OF NASHUA, DISTRICT, MYSTIC & SEATTLE  
(NDMS/USPS-T32-1 AND 13)**

The United States Postal Service hereby files the revised responses of witness Fronk to the following interrogatories of Nashua, District, Mystic & Seattle, dated August 1, 1997. The original responses were filed on August 16, 1997. The revised responses are intended to supersede those responses.

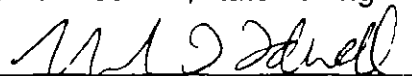
The interrogatories are stated verbatim and are followed by the revised responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
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September 9, 1997

REVISED RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC. (NDMS)

NDMS/USPS-T32-1. Please refer to your testimony at p. 24, where you refer to LR-H-112.

- a. Did you prepare, or participate in any way in the preparation of, LR-H-112.
- b. Unless your answer to preceding part (a) is an unqualified negative, please describe your role with respect to preparation and conduct of the study contained in LR-H-112.
- c. With respect to LR-H-112, are you sponsoring that study?
- d. Please indicate whether any other witness in this docket is sponsoring LR-H-112.

RESPONSE:

- (a) No.
- (b) Not applicable.
- (c) No.
- (d) For purposes of this proceeding, it is my understanding that no Postal Service witness is "sponsoring" LR-H-112 in the sense that it has been incorporated into a witness' testimony. This library reference was prepared by analysts in Cost Studies within Product Finance. The analyst with principal responsibility for the library reference was Sharon Daniel.

REVISED RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO  
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NDMS/USPS-T32-13. In Base Year 1996, what was the total volume of First-Class single piece and nonautomated presort nonstandard pieces that were subject to the surcharge.

RESPONSE: In Base Year 1996, 325.6 million pieces, or 0.6 percent, of First-Class single-piece letters, flats and parcels were subject to the nonstandard surcharge. 49.6 million pieces, or 0.1 percent, of presorted letters, flats and parcels were subject to the surcharge. (In 1996, because reclassification changes were not implemented until July 1, 1996, I am unable to separate nonautomated presort and automated presort nonstandard pieces.) Also, 8.0 million pieces, or 0.3 percent, of carrier route letters, flats, and parcels were subject to the surcharge. In sum, 383.2 million pieces, or 0.4 percent, of First-Class letters, flats and parcels were subject to the surcharge.

DECLARATION

I, David R. Fronk, 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.

*David R. Fronk*

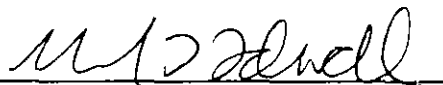
\_\_\_\_\_  
David R. Fronk

*9-9-97*

\_\_\_\_\_  
Date

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.

  
Michael T. Tidwell

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September 9, 1997