

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS CRUM TO INTERROGATORY OF NASHUA PHOTO INC., ET AL.  
IN LIEU OF RESPONSE TO MOTION TO COMPEL  
(NDMS/USPS-T28-1(A)-(D), (F) & (G))

The United States Postal Service hereby provides the response of witness Crum to the following interrogatory of Nashua Photo Inc., et al.: NDMS/USPS-T28-1(a)-(d), (f) & (g), filed on August 8, 1997. The Postal Service had objected to answering these questions on August 18. NDMS moved to compel responses on August 29. A response to that motion would have been due on September 5. On that day, undersigned counsel contacted counsel for NDMS with a proposal to settle this matter. Based on that discussion, the Postal Service has determined to provide answers from the witness to all of the questions subject to the motion to compel. Those answers are attached. Accordingly, the Postal Service requests that the motion to compel be dismissed as moot.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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September 9, 1997

**U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM  
RESPONSE TO INTERROGATORIES OF NDMS**

**NDMS/USPS-T28-1.**

Please refer to your testimony at page 10, where you refer to LR-H-108.

- a. Did you prepare, or participate in any way in the preparation of, the study contained in LR-H-108?
- 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-108.
- c. Are you sponsoring the study contained in LR-H-108?
- d. Please indicate whether any other witness in this docket is sponsoring LR-H-108.
- f. The study in LR-H-108 is undated. When did Christensen Associates submit the final report that has been submitted as LR-H-108?
- g. Under terms of the contract for LR-H-108, did the Postal Service designate a technical representative to oversee the study? If so, were you the Postal Service's designated technical representative at any time during the term of this project.

**RESPONSE**

a. Yes.

b. I personally supervised both the planning and conduct of the studies described in LR-H-108. I produced and/or assisted with the separate analyses to varying degrees. I completely reviewed the printed version of the library reference, other than the computer documentation.

c.-d. As a library reference, it is my understanding that LR-H-108 is not sponsored by any witness. However, I have answered, and am available to answer further, questions about it. I understand that my responses can be entered into the record.

f. I do not agree that the 'study' is undated. It is clearly explained that the analysis is based on 1996 cost and volume data. See, for example, pages 2-3,6-9,11-17 as well as the data sources described. Christensen reproduced the final bound and printed copy and sent copies to postal headquarters the week of June 30, 1997.

**U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM  
RESPONSE TO INTERROGATORIES OF NDMS**

g. One member of our department is designated the official Technical Representative for all contractual resources that we use and handles the administrative details as necessary. Although I am not that person, I oversaw all technical aspects of this project as described in my response to (b) above.

DECLARATION

I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Charles L. Crum

Dated: 9 SEPTEMBER 1997

**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 cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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