

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

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
AND MOTION FOR LATE ACCEPTANCE  
(OCA/USPS-T32-32, 43, 46, 47 AND 50)**

The United States Postal Service hereby files its responses to the following interrogatories of the Office of the Consumer Advocate, dated August 15, 1997: OCA/USPS-T32-32, 43, 46, 47 and 50.

These interrogatories have been redirected from witness Fronk to the Postal Service for response.

Each interrogatory is stated verbatim and is followed by the response.

The responses were due to have been filed on August 29, 1997. The interrogatories were part of a set of approximately 50 interrogatories directed by the OCA to witness Fronk on August 15th. The questions covered a diverse range of topics, many of which were beyond the scope of witness Fronk's testimony and expertise. The overwhelming majority of interrogatories in this set were responded to in a timely fashion. However, it was necessary to redirect many of the questions to various components of postal management at Headquarters in order to gather responsive information. As reflected by this filing today, location of information sources and the production and coordination of responses cannot always be accomplished within the 14-day time limit in the Commission's rules. Accordingly, these responses are being filed today, 11 calendar days late. The Postal Service regrets this unavoidable delay.

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REDIRECTED FROM WITNESS FRONK

OCA/USPS-T32-32. This interrogatory relates to efforts the Postal Service has made to enable mailers to make their mailings automation compatible.

- a. To what extent does the Postal Service supply software or technical assistance to mailers wishing to make their mail automation compatible? Please explain.
- b. Has the Postal Service considered the possibility of offering access on its website to software programs that would help businesses and households prepare envelopes for automation capability? If so, please explain. If not, why not?

RESPONSE:

(a) The Postal Service provides a significant amount of technical assistance to mailers wishing to make their mail automation compatible. The Postal Service has a team of approximately 179 Mailpiece Design Analysts (MDAs) located around the country in postal business centers, business mail entry offices, and postal processing plants. These MDAs are tasked to assist mailers to comply with automation mailing standards. The MDAs, along with account representatives and customer service representatives, conduct mailer's training seminars at postal and customer facilities. Also, the Postal Service provides many publications designed to help mailers understand how to prepare automation compatible mail, including Publication 25 (Designing Business Letter Mail), Publication 28 (Postal Addressing Standards), Publication 63 (Designing Flat Mail), and Publication 353 (Designing Reply Mail).

In addition to being available in an electronic format on the USPS web site, these publications are available in Postal Explorer, a CD-ROM disk provided to customers free of charge. The CD also contains the Domestic Mail Manual and the International Mail Manual.

The Postal Service provides technical consultation at public forums including National Postal Forums, Postal Customer Councils (PCCs), and through our Postal Business Centers. Postal Business Centers also provide letter and flat mail templates that identify correct positioning for designing and

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RESPONSE to OCA/USPS-T32-32 (continued)

formatting mailpieces. These plastic templates and gauges are provided to mailers free of charge and USPS employees show customers how to use them to identify correct and incorrect address placement and design features for a variety of mailpiece sizes.

There are also software programs called Mail Flow Planning Guide and the Rate Calculator which allow customers to input information about their mailpieces and calculate the postage owed for the mailing. A mailer is able to determine what percentage of their mail to send at various rates to meet their mailing budget and service needs.

The National Customer Service Center in Memphis also maintains a list of USPS approved software products that can assist mailers in preparing their mailings. It lists costs and special features for each product. We also publish a Business Partners Handbook, by postal area, to inform customers about vendors and suppliers in their local service area that provide software and mail preparation services to assist mailers in preparing correct mailings.

The Postal Service also provides customer support services related to addressing, including mailing list services, address sequencing services, Address Information System services, and services related to meeting the Coding Accuracy Support System (CASS) requirements for maintaining up-to-date and accurate addresses for automation-compatible mail (see section A900 of the DMM). Bulk mailers often pay private vendors for address management certification services. Note that it probably is not cost-effective for the typical household mailer to pay for the address management services needed to meet Postal Service accuracy and update requirements to qualify for automation-compatible rates.

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RESPONSE to OCA/USPS-T32-32 (Continued)

(b) See part (a) above for a discussion of publications available on the USPS website. The Postal Service has considered the possibility of offering software programs via the World Wide Web to help the public prepare its mail. Presently, the Postal Service provides a critical service in support of this effort via our website through our ZIP Code lookup program. This program allows the public to enter address information and obtain corrected street information, city-state information, ZIP Codes, ZIP+4 Codes, and delivery point information. This service facilitates public preparation of envelopes with complete and correct address information.

The Postal Service has not elected to offer other functions via our website such as envelope design, Facing Identification Mark (FIM) printing, address printing, and POSTNET barcode printing. Our reason for not performing these functions is related to the technical issues involved with supporting these activities for the many different computer systems and printers that exist.

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OCA/USPS-T32-43. Is it the Postal Service's position that the estimates and projections in the Alexandrovich and Potter rebuttal testimony in Docket No. MC95-1 are still correct? Please address specifically all quantitative estimates and projections from that testimony, and provide updates where necessary.

RESPONSE: *The Postal Service is unaware of any basis for disagreeing with witness Alexandrovich's and witness Potter's Docket No. MC95-1 testimony.*

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OCA/USPS-T32-46. Please refer to the rebuttal testimony of witness Alexandrovich in Docket No. MC95-1, at 20, Tr. 16313, where he addresses the costs of purchasing CEM stamps at the post office. He concludes that introducing a CEM stamp would result in increased transaction costs for consumers and increased window costs for the Postal Service.

- a. State your agreement or disagreement with his analysis and conclusions as to increased transaction costs for consumers and increased window costs for the Postal Service.
- b. What would be the incremental window cost to the Postal Service of selling a 30-cent CEM stamp to household consumers at retail postal facilities? Consider in your analysis any increased costs that would be incurred based on the possibility that non-postal retail stores (i.e., so-called consignment outlets) would not choose to carry a 30-cent stamp.
  - (i) In referring to Library Reference H-1, Summary Description of USPS Development of Costs by Segments and Components, Fiscal Year 1996, it appears there are two relevant activity codes: 5040, "At Window Serving a Customer - Selling Stamps," and 6040, "Window-Related Activity - Selling Stamps." Please confirm. If not confirmed, please explain.
  - (ii) Confirm that there is no breakdown for selling different types and denominations of stamps (except for migratory bird stamps). If not confirmed, please explain.
- c. What is the incremental window cost to the Postal Service of selling a new issue of (the current) 32-cent First-Class stamp, e.g., the Bugs Bunny stamp?
- d. How much money does the Postal Service estimate it saves (e.g., avoiding window costs) annually because consignment outlets sell postage stamps? Please explain the derivation of your estimate.
  - (i) Do consignment outlets determine what types of stamps they will carry?
  - (ii) Does the Postal Service place any limitations on the types of stamps consignment outlets may carry?
- e. MPRM arguably would be used by consumers who bought their stamps at either postal facilities or at retail consignment outlets. Would consignment outlets be likely to sell two or more differently priced stamps? In your answer, refer to the percentage of outgoing household mail that would be a candidate for such stamps, e.g., mail used to pay utility and credit card and other bills.
- f. The FY1995 Household Diary Study shows at Table 4-10 that in 1995 households received, on average, 2.91 pieces of "bill/invoice/premium" mail per week, up from 2.52 per week in 1987. The same table shows that households in 1995 received, on average, 1.30 pieces of personal

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- mail per week, down from 1.56 in 1987. Do you agree that there is a trend toward a greater proportion of mail received and sent by households that is business related in nature as opposed to personal in nature? If not, please explain.
- g. Please estimate the proportion of the 2.91 pieces per week of business mail that contain courtesy reply envelopes, and separately, business reply envelopes.
  - h. What percentage of mail sent by households to non-households is currently in a courtesy reply envelope?
  - i. Assume that an MPRM 30 cent rate and a 33-cent regular First-Class rate is approved. Could the Postal Service solve the alleged "two-stamp" problem by issuing stamp booklets with both denominations, e.g., ten 30-cent stamps and ten 33-cent stamps?
  - j. Does the Postal Service sell other stamp denominations in booklet form (e.g., post cards)? Please describe.

RESPONSE:

- (a) The Postal Service is unaware of any basis for disagreeing with witness Alexandrovich's Docket No. MC95-1 testimony.
- (b) The Postal Service has not studied the incremental cost of selling a 30-cent CEM stamp to household consumers as it was not a part of its rate proposal.
- (i) Confirmed.
- (ii) Confirmed.
- (c) The Postal Service has not measured this cost.
- (d) An estimate of annual savings is not available. The number of consignment transactions is unknown.
- (i)-(ii) Consignment outlets may carry any combination of 32-cent, Express Mail, or Priority Mail stamps. Less than 10 percent of consignees offer Express Mail or Priority Mail stamps, with the great majority only offering the 32-cent stamp. Consignees are also able to choose among several options on the design of the stamps.

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RESPONSE to OCA/USPS-T32-46 (Continued)

(e) See response to part (d) above. The Postal Service is unable to comment on the use of MPRM due to lack of information about the proposal.

(f) The proportion of "bill/invoice/premium" vs. personal mail received by households has changed since 1987, but very little since 1992. In fact, any differences in that proportion between 1992 and 1995 would be within sampling error. Household Diary Study Table 4-10 from 1992 to 1995, shows the following:

<b>Pieces Per Week</b>	<b>1987</b>	<b>1992</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>
Total Personal Mail	1.56	1.36	1.35	1.29	1.30
Bills/invoices/premiums	2.52	2.98	2.84	2.86	2.91

The balance of the mail in all categories has changed considerably in the last ten years, but the proportion of personal to bill payment mail has remained remarkably consistent over the last four years.

(g) The Household Diary Study asks if "a mailing envelope/card was provided" but there is no distinction between courtesy reply envelopes and business reply envelopes. In FY 1995, 50.8% of the mail sent by households was sent in an envelope provided by an industry (see attached table 193). Of the 2.91 pieces per week you cited from Table 4-10 that were received by households, Table 4-48 shows that households responded to 2.42. Table 193 shows that an average of 3.22 pieces per week were sent by households in FY 1995 and 50.8% (1.64 pieces) were sent in a courtesy or business reply envelope. Dividing the 1.64 pieces that were sent in an envelope provided by the industry, by the total of 2.42 pieces of business mail sent by households, the proportion that contained courtesy reply or business reply envelopes in FY 1995 is 67.8%.



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(h) As the statistics presented in response to "g" above show, 67.8% of mail sent by households to nonhouseholds is currently in a courtesy or business reply envelope.

(i) The Postal Service has not investigated this issue as it is not presently faced with a proposal which revives the "two-stamp" issue.

(j) Yes. Presently there are booklets for 55-cent LOVE stamps intended for two-ounce First-Class pieces and 20-cent BLUE JAY stamps for postal cards.

U.S.P.S. HOUSEHOLD DIARY STUDY - DIARY - FISCAL YEAR 1995 (SEPT. 19, 1994 - SEPT. 17, 1995)

TABLE 193  
 FIRST-CLASS MAIL SENT  
 Q. 8 - WAS THE ENVELOPE/CARD PROVIDED  
 (BASED TO FIRST-CLASS MAIL ONLY)  
 (BASED TO NON-HOLIDAY MAIL ONLY)

	FIRST-CLASS MAIL SENT - INDUSTRY										
	TOTAL	TOTAL SER VICES	PHONE CO.	ELEC. GAS WATER	MEDI CAL	OTHER PROF.	LEI SURE SERV.	CABLE TV	COMPU TER REL.	CRAFT SMAN	GAR BAGE/TRASH SER VICE
UNWEIGHTED HOUSEHOLDS	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300
UNWEIGHTED PIECES	11043	2418	600	884	315	48	135	253	26	43	20
WEIGHTED HOUSEHOLDS	983	983	983	983	983	983	983	983	983	983	983
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
WEIGHTED PIECES (BASE)	3164	700	182	261	91	16	27	69	10	12	7
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
I PROVIDED MY OWN MAILING CARD	632	175	21	53	38	11	17	6	2	7	4
	20.0	25.0	11.6	20.3	42.1	66.0	61.6	9.0	18.5	57.5	65.1
	100.0	27.7	3.3	8.4	6.0	1.7	2.6	1.0	0.3	1.1	0.7
	20.0	5.5	0.7	1.7	1.2	0.3	0.5	0.2	0.1	0.2	0.1
A MAILING ENVELOPE/CARD WAS PROVIDED	1608	500	154	199	50	4	9	60	8	4	2
	50.8	71.4	84.9	76.3	54.8	24.0	34.5	86.9	75.3	36.5	26.3
	100.0	31.1	9.6	12.4	3.1	0.2	0.6	3.7	0.5	0.3	0.1
	50.8	15.8	4.9	6.3	1.6	0.1	0.3	1.9	0.2	0.1	0.1
DON'T KNOW/NO ANSWER	142	26	6	9	3	2	1	3	1	1	1
	4.5	3.7	3.5	3.4	3.1	9.9	4.0	4.0	6.2	6.0	8.6
	100.0	18.2	4.5	6.3	2.0	1.1	0.8	2.0	0.4	0.5	0.4
	4.5	0.8	0.2	0.3	0.1	0.1		0.1			
NOT INDUSTRY MAIL	782	-	-	-	-	-	-	-	-	-	-
	24.7										
	100.0										
	24.7										
MEAN	3.22	0.71	0.18	0.27	0.09	0.01	0.03	0.07	0.01	0.01	0.01
STD DEV	6.26	1.69	0.56	0.82	0.46	0.18	0.74	0.33	0.15	0.15	0.10
STD ERROR	0.09	0.03	0.01	0.01	0.01	-	0.01	-	-	-	-

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TOTAL		ELEC.		MEDI		OTHER		LEI		CABLE		COMPU		GAR	
SER	PHONE	GAS	WATER	CAL	PROF.	SERV.	SURE	TV	REL.	TER	REL.	SMAN	TRASH	VICE	SIGMA
3164	700	182	261	91	16	27	69	10	12	7					
100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

EACH CELL CONTAINS:  
 COUNT  
 VERTICAL PERCENT  
 HORIZONTAL PERCENT  
 CELL PERCENT

U.S.P S. HOUSEHOLD DIARY STUDY - DIARY - FISCAL YEAR 1995 (SEPT. 19, 1994 - SEPT. 17, 1995)

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	FIRST-CLASS MAIL SENT - INDUSTRY										
	TOTAL	DEPT. MER	DEPT. STORE	DEPT. MAIL ORDER	DEPT. OTHER STORE	DEPT. PUBLI SHER	DEPT. LAND PROMO TION	DEPT. RES TAU RANT	DEPT. MANU FAC TURER	DEPT. AUTO DEAL ER	DEPT. SER VICE STN.
UNWEIGHTED HOUSEHOLDS	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300
UNWEIGHTED PIECES	11043	2011	438	494	216	706	4	1	74	5	6
WEIGHTED HOUSEHOLDS	983	983	983	983	983	983	983	983	983	983	983
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
WEIGHTED PIECES (BASE)	3164	568	122	138	65	200	1	0.	16	1	1
	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
I PROVIDED MY OWN MAILING CARD	632	134	26	35	26	29	0.	0.	10	0.	1
	20.0	23.7	21.7	25.6	40.1	14.4	26.5	100.0	62.7	13.4	53.4
	100.0	21.3	4.2	5.6	4.1	4.5	0.1	.	1.6	.	0.1
	20.0	4.2	0.8	1.1	0.8	0.9	.	.	0.3	.	.
A MAILING ENVELOPE/CARD WAS PROVIDED	1608	411	92	99	37	165	1	-	5	1	1
	50.8	72.4	75.0	71.7	56.2	82.7	73.5	.	29.6	86.6	38.3
	100.0	25.5	5.7	6.2	2.3	10.3	0.1	.	0.3	0.1	.
	50.8	13.0	2.9	3.1	1.2	5.2	.	.	0.1	.	.
DON'T KNOW/NO ANSWER	142	23	4	4	2	6	-	-	1	-	0.
	4.5	4.0	3.3	2.8	3.7	2.9	.	.	7.7	.	8.2
	100.0	15.9	2.9	2.7	1.7	4.1	.	.	0.9	.	0.1
	4.5	0.7	0.1	0.1	0.1	0.2	.	.	.	.	.
NOT INDUSTRY MAIL	782	-	-	-	-	-	-	-	-	-	-
	24.7	.	.	.	.	.	.	.	.	.	.
	100.0	.	.	.	.	.	.	.	.	.	.
	24.7	.	.	.	.	.	.	.	.	.	.
MEAN	3.22	0.58	0.12	0.13	0.06	0.21	-	-	0.01	-	-
STD DEV	6.26	1.47	0.55	0.64	0.40	0.79	0.04	0.01	0.18	0.04	0.04
STD ERROR	0.09	0.01	0.01	0.01	-	0.01	-	-	-	-	-

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FIRST-CLASS MAIL SENT - INDUSTRY

TOTAL	DEPT										
	MER	STORE	MAIL	OTHER	PUBLI	PROMO	TAU	MANU	AUTO	SER	
	CHANT	DISC.	ORDER	STORE	SHER	TION	RANT	TURER	ER	STN	VICE
3164	568	122	138	65	200	1	0.	16	1	1	
100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

SIGMA

EACH CELL CONTAINS:  
 COUNT  
 VERTICAL PERCENT  
 HORIZONTAL PERCENT  
 CELL PERCENT

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OCA/USPS-T32-47. As noted, witness Alexandrovich complained about increased window costs for the Postal Service if it were to sell CEM stamps.

- a. How many different denominations of stamps does the Postal Service sell?
- b. Currently, what percentage of total stamps sold are not 32-cent First-Class letter stamps?
- c. How many kinds of 32-cent First-Class Letter stamps does the Postal Service sell?
- d. Confirm that the Postal Service promotes the sale of different kinds of 32-cent First-Class letter stamps by informing the public of their availability through such means as displaying them at retail postal facilities. If not confirmed, please explain.
- e. When considering whether or not to release a new version of a 32-cent First-Class stamp, does the Postal Service analyze the incremental window costs of introducing an additional stamp set? If so, describe how the analysis is done and quantify such costs for some recent issues. If not, why not?

RESPONSE:

- (a) Table 1 below counts the thirty USPS stamp denominations.

<i>Denomination</i>	<i>Count</i>	<i>Denomination</i>	<i>Count</i>
1 Cents	1	32 Cents	16
2 Cents	2	35 Cents	17
3 Cents	3	45 Cents	18
4 Cents	4	46 Cents	19
5 Cents	5	50 Cents	20
10 Cents	6	52 Cents	21
14 Cents	7	55 Cents	22
15 Cents	8	60 Cents	23
19 Cents	9	65 Cents	24
20 Cents	10	78 Cents	25
23 Cents	11	1 Dollar	26
25 Cents	12	2 Dollars	27
28 Cents	13	3 Dollars	28
29 Cents	14	5 Dollars	29
30 Cents	15	10.75 Dollars	30

Source: *USA Philatelic*, Fall 1997 Vol 2, No. 3

- (b) An accounting of stamps sold, by denomination, is not maintained. However, of stamps shipped during Fiscal Year 1996, approximately one-third were not 32-cent stamps.

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(c) The number of different kinds of 32-cent First-Class stamps the Postal Service sells differs each year. The Customer Stamp Advisory Committee (CSAC) determines the stamp program and subjects in each year's program with final approval from the Postmaster General. Table 2 lists the 32-cent stamp issues and designs available for Fall 1997.

USPS 32 Cents Stamps, Fall 1997					
Issue	Count	Designs	Issue	Count	Designs
Legenday Football Coaches	1	4	James K. Polk	38	1
Classic American Aircraft	2	20	Comic Strip Classics	39	20
Humphrey Bogart	3	1	Civil War	40	20
Marshall Plan	4	1	POW & MIA	41	1
Bugs Bunny	5	1	Flag Over Porch	42	1
Dinosaurs	6	15	Cal Farley	43	1
Raoul Wallenberg	7	1	Milton Hershey	44	1
Thornton Wilder	8	1	Love Cherub	45	1
Pacific 97 (Triangle)	9	2	Non-Denominated Love (32cents)	46	1
Merian Botanical	10	2	Madonna & Child	47	1
Helping Children Learn	11	1	Hanukkah	48	1
Love Swans	12	1	Skaters	49	1
Statue Of Liberty	13	1	Family Scenes	50	4
Benjamin O. Davis	14	1	Holiday Madonna & Child	51	1
Lunar Year	15	1	Holiday Children & Santa	52	4
Computer Technology	16	1	"G" Official Mail Stamp	53	1
Endangered Species	17	15	Flag Over Porch (Inerless) Self-Adhesive	54	1
F. Scott Fitzgerald	18	1	Flag Over Porch Self-Adhesive	55	1
Big Band Leaders	19	4	Midnight Angel	56	1
Song Writers	20	4	Holiday Children & Santa Self-Adhesive	57	4
Riverboats	21	5	Peaches And Pears	58	2
Rural Free Delivery	22	1	Pink Rose	59	1
Iowa Statehood	23	1	Ferryboat	60	1
Olympic Games	24	1	Yellow Rose Booklet	61	1
Folk Heroes	25	4	Flag Over Porch Booklet	62	1
James Dean	26	1	Love Cherub Booklet	63	1
Breast Cancer Awareness	27	1	Midnight Angel Booklet	64	1
Prehistoric Animals	28	4	Holiday Sledding ATM Booklet	65	1
American Indian Dances	29	5	Holiday Children And Santa Booklet	66	4
Tennessee Statehood	30	1	Peaches And Pears Booklet	67	2
Georgia O'Keeffe	31	1	Pink Rose Booklet	68	1
Olympic Classic Collection	32	20	Flag Over Field ATM	69	1
Fulbright Scholarships	33	1	Winter Garden Flowers	70	5
Pioneers Of Communication	34	4	Holiday Madonna & Child Booklet	71	1
Smithsonian	35	1	Fall Garden Flowers	72	5
Ernest E. Just	36	1	Great Lakes Lighthouses	73	5
Utah Statehood	37	1	World War II - 1945	74	10
			Total	NA	241

Source: USA Philatelic, Fall 1997 Vol 2, No 3

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(d) Yes, the USPS stamp promotion programs routinely displays 32 cent First-Class stamps in retail areas, for example, shrink-wrap packages in postal lobbies.

(e) No.



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REDIRECTED FROM WITNESS FRONK

OCA/USPS-T32-50. Please describe the educational efforts the Postal Service plans in the event a 33-cent First-Class postage rate is approved, and in the event PRM and QBRM are approved. Separately list the projected costs of such campaigns.

RESPONSE: The Postal Service will write standards for PRM and QBRM and publish them in the *Federal Register* and the *Postal Bulletin* with other standards to implement the provisions of Docket No. R97-1. The Postal Service will include a description of these new rates in the *Consumer's Guide to Postal Rates and Fees* and the *Consumer's Guide to Postal Services and Products*. Posters for the lobby walls of Post Offices will include a description of these rates.

Also, there may be national training for select bulk mail acceptance employees, personnel to be involved in establishing and auditing PRM systems, Mailpiece Design Analysts, and window clerks, as well as training of customers by Postal Service employees.

It is not possible to separately quantify the training costs for PRM, QBRM, or the 33-cent stamp since those programs will be part of the complete training package for Docket No. R97-1.

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