

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

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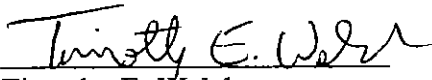
POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**FIRST INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS OF
NIAGARA TELEPHONE COMPANY, INTERVENOR,
TO THE UNITED STATES POSTAL SERVICE
WITNESS TOLLEY**

Niagara Telephone Company (NTC), Intervenor, by its attorneys, hereby requests that a qualified witness of the United States Postal Service answer the following interrogatories and request for production of documents pursuant to Rule 25 and Rule 26 of the Commission's Rules of Practice and Procedure. If the designated witness is unable to respond to any interrogatory, please refer the interrogatory to a witness able to answer.

Respectfully submitted,
Niagara Telephone Company


Timothy E. Welch

Its Attorney

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Dr. Tolley (USPS-T-6)


NTC/USPS-T-6-1

Niagara Telephone Company is interested in the fact that the USPS intends to charge the same postage for mail which it transports significant distances as for mail which essentially is not transported by the USPS from the Post Office to which the mail is deposited by the consumer. Please describe the United States Postal Service's rules and policies regarding the establishment, operation, and maintenance of "Local Only" mail boxes and mail slots found in Post Offices throughout the country. Areas of discussion should include, in addition to anything else you might think relevant:

- a) How many Post Offices are there in the United States and how many of those Post Offices, either as a raw number or as a percentage of the total number of Post Offices, utilize either an on premises "Local Only" mail box or mail slot?
- b) Does the USPS have any written rules or policies concerning the establishment of "Local Only" depositories? If the answer is yes, please provide a copy or a reference citation. If the answer is no, please explain the cost control mechanism which monitors ad hoc implementation by individual Post Offices of "Local Only" mail depositories.
- c) What purposes do the "Local Only" mail depositories serve? That is, are "Local Only" mail depositories established for efficiency and cost saving reasons?
- d) In developing the instant rate proposal, was any consideration given to establishing a discounted rate for mail deposited into "Local Only" depositories?
- e) Is the USPS currently conducting, or has the USPS conducted since January 1, 1990, any studies or experiments concerning cost savings or efficiencies realized through the implementation of "Local Only" mail depositories? If the answer is yes, please provide a copy of the report(s) generated as a result of such studies or experiments. Also, please explain how such information was incorporated into the instant rate proposal for purposes of determining that "Local Only" and other mail should be charged at the same rates.

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of September 1997 supervised the service of the foregoing document as required in the Presiding Officer's Ruling No. R97-1/4.


Timothy E. Welch