

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

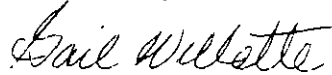
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(OCA/USPS-64-70)
September 12, 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

primarily for philatelic purposes or for general mailing purposes. If documents exist summarizing policies behind such decisions, please supply them.

OCA/USPS-66. Please refer to the Postal Service response to OCA/USPS-T32-46(e). Please provide a response to the same question, but instead assuming that the CEM recommendation in PRC Op. MC95-1 has been adopted.

OCA/USPS-67. Please refer to the response to OCA/USPS-T32-47(e). Please supply a response to the "If not, why not" portion of the interrogatory.

OCA/USPS-68. Confirm that the Postal Service has a Consumer Advocate's office. If not confirmed, please explain.

OCA/USPS-69. Please list all reports, studies, surveys, and memoranda prepared by the Consumer Advocate's office on or after January 1, 1995, whose subject matter, in whole or in part, relates to postage rate proposals, fee proposals, or mail classification proposals, raised by the Postal Service in this docket. Exclude from the response any *memoranda relating solely to an individual consumer's complaint, or any documents relating to complaints about mail delivery service from specific postal facilities.*

- a. For each item on the list, provide a brief description of the contents of the item.
- b. For each item on the list related to insurance, provide the documents.

OCA/USPS-70. Please refer to Docket No. MC83-1. Specifically refer to the following portions of the docket:

(1) The Notice of the proceeding states, at page 2:

The second change proposed by the Postal Service is to increase from 100 to 108 inches the length and girth combined for all of the Postal Service's parcel services; that is, parcel post, special-rate fourth-class, library rate, priority mail and Express Mail. The Postal Service says that the 108-inch limitation is used by some of its largest competitors, and the enlargements would bring more standardization to parcel delivery service, reducing confusion and inefficiency.

(2) The Request states, at page 2:

At the same time, the Postal Service seeks to improve service to the public by enlarging all of its parcel size limitations to equal those used by other providers of small parcel service, thus bringing more standardization to the small parcel market.

(3) The direct testimony of Postal Service witness Wargo states, at page 7:

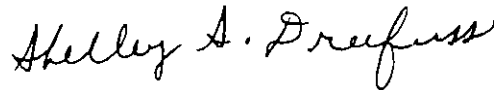
At the same time, the proposal will enlarge the Postal Service's current maximum size limitation for all parcel service.

(4) The direct testimony of Postal Service witness Wargo, at pages 10-11, Section C, which is entitled "Enlarged Parcel Size Limitations Will Help Standardize Available Parcel Delivery Service."

- a. Confirm that the Postal Service Request in Docket No. MC83-1 had two purposes, one relating to "establishing uniform parcel post size and weight limitations" (see Request, page 2) among all postal facilities, and the second "to improve service to the public by enlarging all of its parcel size limitations to equal those used by other providers" *Id.*
- b. If not confirmed, please explain.

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.

A handwritten signature in cursive script that reads "Shelley S. Dreifuss".

SHELLEY S. DREIFUSS
Attorney

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