

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
)

SECOND SET OF INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS
DONALD J. O'HARA (USPS-T-30)

Major Mailers Association asks the United States Postal Service to answer the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. In answering these interrogatories, the witness is requested to follow the General Instructions that were set forth in the Attachment to earlier interrogatories to the witness. If the designated witness is unable to respond to any interrogatory, the Postal Service is asked to redirect the question to another Postal Service witness who can answer it.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION



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September 16, 1997

MMA INTERROGATORIES TO USPS WITNESS
(Donald J.O'Hara: Set Two)

MMA/USPS-T30-9.

In your answer to MMA/USPS-T30-8 you indicate that the adjustments you made in Exhibits USPS-30F and 30G were provided to you by other pricing witnesses that are cited in your revised Workpaper III. Please also refer to your Exhibit USPS-30D, where you list percentage increases in rates and fees that are proposed by the Postal Service in this proceeding.

A) Please confirm that the Postal Service computes the proposed percentage increases by dividing the unit revenue for the test year at proposed rates by the unit revenue for the test year at current rates and subtracting one. If you cannot confirm, please explain.

B) Please confirm the following data in \$ thousands for Standard Mail A Commercial Regular mail as obtained from your revised Exhibits USPS-30A, B and G and USPS-T-30, W/P I, p.2 (revised).

	Revenues	Volumes
Current Rates	7,192,729	34,359,008
Proposed Rates	8,022,045	37,627,554

If you cannot confirm, please provide the correct data along with the appropriate support.

C) Please confirm that the unit revenues computed from data shown above in paragraph B) are .2093 for current rates and .2132 for proposed rates. If you cannot confirm please explain.

D) Please confirm that the unit revenues as shown in USPS-T-30 W/P I,

p. 2 (revised) and USPS-T-30 W/P II, p. 2 (revised) are .2093 for current rates and .2132 for proposed rates. If you cannot confirm, please explain.

E) Please confirm that the proposed percentage increase in rates for Standard Mail A Commercial Regular is 1.86% $[(.2132 / .2093) - 1]$. If you cannot confirm, please explain.

F) Please explain why Exhibit USPS-30D (revised) indicates that the proposed increase in rates for Standard mail A Commercial Regular is 4.1%.

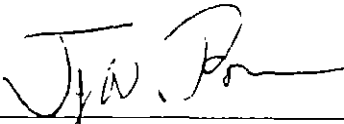
G) Please explain how an intervenor in this proceeding can make comparable adjustments as shown in your USPS-T-30, W/P III (revised) under the Commission's established attributable cost methodology.¹

(End of this set of interrogatories)

¹ Recognizing the Presiding Officer has not yet ruled on MMA's September 8 Motion to Compel, MMA is agreeable to having the Postal Service defer its Response or Objection to Subpart (G) of this Interrogatory until the Presiding Officer rules.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail,
upon the participants requesting such service in this proceeding.



Jeffrey Plummer

September 16, 1997