

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
FOLLOW-UP INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS WILLIAM P. TAYMAN
(OCA/USPS-T9-40)
September 19, 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.

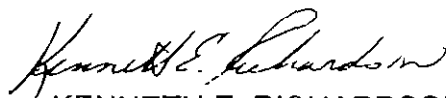
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

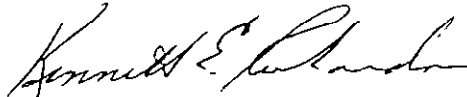
Attorney

OCA/USPS-T9-40. Your responses to OCA/USPS-T9-33 and T9-34 have indicated that the Augmented Sales Force program is being re-evaluated and the Tactical Sales Force strategy is revised. As filed, the estimated increased expense for those two "Other Programs" for FY 1998 as shown in library reference H-10, exhibit B, totals \$64.841 million (Augmented Sales Force with \$38.175 million and Tactical Sales Force strategy with \$26.666 million), yet your responses have accounted for only \$18.2 million (\$2 million for the New York pilot program for the Augmented Sales Force, \$6 million for the Manifest Mailing System, and \$10.2 for the Customized Packaging System).

- a. Please confirm that the revised estimated expenditure for the programs that encompass the Tactical Sales Force strategy and the Augmented Sales Force program for FY 1998 is \$18.2 million. If you do not confirm, please explain.
- b. Are any other programs being funded from the excess FY 1998 expenditure increase estimates for the Augmented Sales Force program or the Tactical Sales Force strategy program? If so, please explain and provide the estimated FY 1998 increased costs for those programs.
- c. Please confirm that witness Patelunas utilizes the amounts from exhibit B in his roll forward model, exhibit 15A, pages 3-4. If not, 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, appearing to read "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

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