

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-43,  
AND OCA/USPS-T24-73A REDIRECTED FROM WITNESS LION),  
AND MOTION FOR EXTENSION OF TIME TO RESPOND TO OCA/USPS-25-41  
(September 19, 1997)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-43, filed on September 5, 1997; and OCA/USPS-T24-73a, filed on September 5, 1997, and redirected from witness Lion. Interrogatory OCA/USPS-42 was redirected to witness Alexandrovich.

The Postal Service also moves for extension of time to respond to Office of the Consumer Advocate interrogatories OCA/USPS-25-40. These interrogatories, concerning various issues related to discounted rates for nonpresort First-Class Mail, require identification of individuals who can provide responsive information, preparation of individual responses, and review and coordination of these responses. These activities are expected to take about one more week.

Finally, the Postal Service moves for extension of time until Monday to allow the Inspection Service to complete its response to interrogatory OCA/USPS-41.

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TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-43.** Please refer to the response to OCA/USPS-T24-49a. Please confirm that the "TOTAL" for the column "1994" should be 160,812. If you do not confirm, please explain.

**RESPONSE**

Confirmed.

**OCA/USPS-T24-73.** Please refer to your testimony at page 1, lines 17-22.

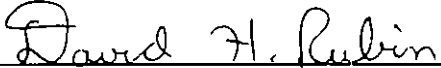
- a. Please confirm that “contract postal units” (herein contract stations) can be grouped by the type of carrier delivery service provided, i.e., as a city delivery office, a non-city delivery office, or a nondelivery office. If you do not confirm, please explain.

**RESPONSE:**

- a. Confirmed, in the sense that contract postal units, like classified stations and branches, are categorized by the type of carrier delivery provided by the administering post office.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
David H. Rubin  
David H. Rubin

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September 19, 1997