

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 WITNESS O'HARA
TO INTERROGATORY OF AMERICAN BUSINESS PRESS
(ABP/USPS-T30-8)**

The United States Postal Service hereby files the response of witness O'Hara to the following interrogatory of American Business Press, filed September 5, 1997:

ABP/USPS-T30-8.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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September 19, 1997

**RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO
INTERROGATORIES OF THE AMERICAN BUSINESS PRESS**

ABP/USPS-T-30-8.

In response to ABP/UPS-T30-5, you assert that your testimony as to the "moderately high" value of service afforded to periodicals is based upon actual service, not service standards. Yet you also state that the Postal Service has no nationally representative data on actual service.

- (a) Why has the Postal Service failed to collect such service data for periodicals?
- (b) How can you assess the quality of service actually given to periodicals when you have no service data?

RESPONSE:

- (a) I am informed that the Postal Service has found no cost effective way to develop a system that is representative of Periodicals Mail in terms of deposit date to in-home delivery.
- (b) Please see my response to VP-CW/USPS-T30-4.

DECLARATION

I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

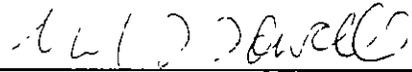


Donald J. O'Hara

9-19-97
Date

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.



Michael T. Tidwell

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September 19, 1997