

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 INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS RALPH J. MODEN  
(OCA/USPS-T4-27-28)  
September 22, 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 the 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.

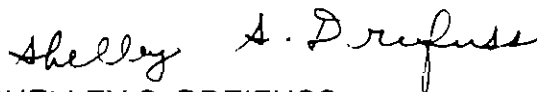
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T4-27. This interrogatory follows up on your response to interrogatory DMA/USPS-T4-42b, in particular, to your statement: “[M]ail with a window of requested in-home dates may be curtailed consecutive days.”

- a. Is it plausible to expect that some Postal Service costs are higher when mail is curtailed for the benefit of the mailer (so that mail delivery can be timed for a particular “window”), e.g., storage or space-related costs? Please explain.
- b. Is it possible that such curtailment (i.e., for the benefit of the mailer), can even add to labor costs? Please explain.

OCA/USPS-T4-28. Does the Postal Service ever “curtail” delivery of First-Class Mail at the request of the mailer?

- a. If so, under what circumstances? Please relate anecdotal descriptions of instances in which First-Class mailers have requested or might wish to request curtailment so that a delivery window can be met.
- b. If not, why not?
- c. What is the Postal Service’s policy when a request for curtailment by a First-Class mailer is submitted? If any documentation of such a policy exists, please provide it.
- d. For purposes of comparison, what is the Postal Service’s policy when a request for curtailment by a Standard A mailer is submitted? If any documentation of this policy exists, please provide it.

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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