

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES
T32-137 AND T32-138
(September 24, 1997)**

The United States Postal Service hereby files these objections to the following interrogatories directed by the Office of the Consumer Advocate to witness Fronk on September 16, 1997: OCA/USPS-T32-137 and T32-138.

The interrogatories, like others propounded by the OCA, request that witness Fronk state whether the Docket No. MC95-1 Courtesy Envelope Mail classification recommended by the Commission and rejected by the Governors (or a variation thereof) would be "workable" or "inconsistent with general Postal Service objectives and policies."

The Postal Service objects to these interrogatories. The Postal Service's position on the Docket No. MC95-1 CEM issue is well-documented in the appropriate place -- in the Docket No. MC95-1 record and in its Docket No. MC95-1 legal briefs. The Governors' Docket No. MC95-1 CEM decision speaks for itself.

There is no CEM proposal in the instant proceeding to which the Postal Service can respond to or should be required to anticipate at this time in Docket No. R97-1. If the OCA intends to revive some variation of its CEM proposal in the instant proceeding, there is a time and a place in the procedural schedule for such a proposal to be introduced. Then, the Postal Service and other parties, in accordance with that same procedural schedule, are permitted to examine it through discovery and file testimony and briefs which address its "workability" or its consistency with "general Postal Service

objectives and policies.”

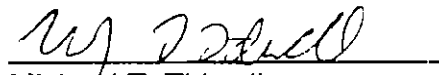
The Postal Service should not be required to declare its position concerning any intervenor proposal before it is formally proposed and before the Postal Service has been afforded an opportunity to examine it in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 24, 1997

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1145
September 24, 1997

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