

DOCKET SECTION

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 USPS WITNESS FRONK TO
OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY T32-107
AND MOTION FOR LATE ACCEPTANCE**

The United States Postal Service hereby files the response of witness Fronk to the following interrogatory of the Office of the Consumer Advocate, dated September 2, 1997: OCA/USPS-T32-107.

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

The answer was due to have been filed on September 16, 1997. Witness Fronk has been working diligently to respond to and review a significant volume of discovery in this proceeding. As a consequence, it has not been possible for him to prepare timely responses to all discovery requests.

To make matters worse, a Law Department computer malfunction prevented the Postal Service from filing the response yesterday. The Postal Service regrets this unavoidable delay.

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

RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T32-107. Please list all documents, including, but not limited to, internal memoranda, reports, studies, and surveys (whether or not in final form) that you consulted, or relied upon in whole or in part, in the preparation of your testimony.

RESPONSE: In preparing my testimony, I relied upon: (1) the "Household Diary Study: Fiscal Year 1995" (USPS Library Reference H-162), (2) the testimony of witness Needham (USPS-T39), which provided me with a proposed fee for the PRM permit and for the per-piece fee for QBRM, (3) The Metropolitan Chicago Information Center (MCIC) Update, Spring 1997, which is a two-page newsletter, (4) the testimony of witness Tolley (USPS-T-2, Chapter II), for information on electronic alternatives to the mail, (5) the testimony of witness Alexandrovich (USPS-RT-7) and witness Potter (USPS-RT-6) in Docket No. MC95-1, (6) the CARAVAN® Survey of "Prepaid Reply Mail: Household Weighting Study." (USPS Library Reference H-200), (7) the cost study of witness Miller (USPS-T-23), (8) hourly labor costs from USPS Library Reference H-194, (9) the response to OCA/USPS-T3-10 in Docket No. MC97-1, (10) historical billing determinants for the percentage of presorted mail that was prebarcoded, and (11) my own workpapers.

All of the above documents that I relied upon are referenced in my testimony.

I have interpreted your term "consulted" to also include documents that I looked at and that I was familiar with, but did not rely on, in preparing my testimony. These documents are: (1) "Qualitative Market Research - Prepaid Reply Mail Product Concept In-Depth Interviews with Businesses - Final Report" (USPS Library Reference H-226), and (2) "Final Report - Prepaid Reply Mail Market Research; Consumer Research Report" (USPS Library Reference H-242).

RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T32-108. Please supply all reports, studies, and surveys (whether or not in final form) that you consulted, or relied upon in whole or in part, in the preparation of your testimony.

RESPONSE: All such reports, studies, and surveys have been supplied. Please see response to OCA/USPS-T32-107.

DECLARATION

I, David R. Fronk, 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.



David R. Fronk

9-23-97

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

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