

# 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

OFFICE OF THE CONSUMER ADVOCATE  
FOLLOW-UP INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS MICHAEL K. PLUNKETT  
(OCA/USPS-T40-32-39)  
September 25, 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 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-T40-32. Please refer to your response to OCA/USPS-T40-9.

- a. Consider a hypothetical situation where a mailer sends a Christmas gift he or she purchased on or about December 1, and mails the gift soon thereafter (after having purchased insurance). The parcel is lost or totally destroyed. Upon presentation of a sales receipt, invoice, or appropriate statement of value from a reputable dealer, and after filing a claim, will the mailer receive full replacement value? Please explain.
- b. Consider the same hypothetical as in (a), but the mailer purchased the gift on September 1, and never used it personally. The actual mailing takes place in December.

OCA/USPS-T40-33. Please refer to your responses to OCA/USPS-T40-7 and 10.

Confirm that no documents exist (including documents which advise employees what the "remaining useful life" of an article is and how to evaluate it) that would tell Accounting Center employees or other postal employees how to depreciate items for insurance purposes other than the DMM guidelines. If not confirmed, please explain.

OCA/USPS-T40-34. Please refer to your response to OCA/USPS-T40-12. You state that in FY 1997, a total of 408 appeals were filed. Please provide a breakdown of these appeals by type of appeal (e.g., claimant did not think the actual value placed on the item was sufficient, etc.).

OCA/USPS-T40-35. Please refer to your responses to OCA/USPS-T40-14 and 15.

Please confirm that the insurance business of the Postal Service is not regulated by any state or federal agency. If not confirmed, please explain.

OCA/USPS-T40-36. Please refer to your responses to OCA/USPS-T40-18 and 19.

Please provide all public court documents that consist of complaints, answers, and judicial decisions that reach the final merits of any court actions, that are dated on or after January 1, 1992, and that relate to insurance claims brought by uninsured mailers against the Postal Service.

OCA/USPS-T40-37. Please refer to your response to OCA/USPS-T40-11. Is Publication 122 routinely handed out to insurance purchasers at the time they purchase insurance? Please discuss.

OCA/USPS-T40-38. Please refer to your response to OCA/USPS-T40-11. Is Publication 201 routinely handed out to insurance purchasers at the time they purchase insurance? Please discuss.


OCA/USPS-T40-39. Please refer to your response to OCA/USPS-T40-16.

- a. Please describe the training that clerks receive in the DMM provisions relating to indemnity claims.
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- b. Provide any documents used in such training.
- c. Are all window clerks trained in the DMM provisions relating to indemnity claims?  
Please discuss.

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.

  
SHELLEY S. DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
September 25, 1997