

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 UNITED STATES POSTAL SERVICE WITNESS O'HARA
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T30-10)**

The United States Postal Service hereby files the response of witness O'Hara to the following interrogatory of the Office of the Consumer Advocate, filed September 22, 1997: OCA/USPS-T30-10.


The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
October 3, 1997

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO THE
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T30-10. This interrogatory follows up on witness Moden's response to interrogatory DMA/USPS-T4-42b, in particular, to his statement: "[M]ail with a window of requested in-home dates may be curtailed consecutive days." (Witness Moden's earlier response to interrogatory DMA/USPS-T4-21b establishes that the curtailment statement applies "100 percent" to Standard A mail.)

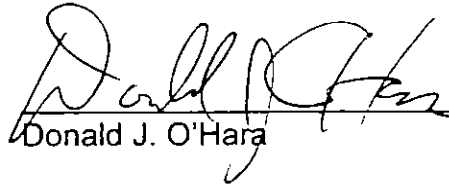
- a. Do you agree that curtailing mail for a period of time for the convenience of the mailer, i.e., so that a delivery window can be met, increases the "value of the mail service . . . to . . . the sender" under subsection 3622(b)(2)? If you do not agree, please explain.
- b. You indicate in your testimony, at 32-33, that "due to its deferability," Regular and other Standard subclasses have a "relatively low value of service." But has the curtailment of Standard Mail A at the request of the mailer and for the mailer's advantage caused you to increase Standard Mail A subclasses' cost coverages?
 - i. If so, please provide a citation to your testimony and/or workpapers where you have explicitly increased the cost coverage of the Standard Mail A subclasses in recognition of this benefit.
 - ii. If not, why did not this benefit influence you to propose a somewhat higher cost coverage for Standard Mail A subclasses?

RESPONSE:

a.-b. I understand that curtailment to meet a requested delivery window applies almost exclusively to Standard (A) ECR mail. I considered this aspect of Standard (A) ECR service in my testimony at page 35, lines 2-6, noting that the Postal Service's ability to accommodate requests for a specified delivery window often requires planning and coordination on the part of the mailer. See also my response to VP-CW/USPS-T30 3(b).

DECLARATION

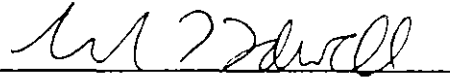
I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.


Donald J. O'Hara

10-2-97
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.

A handwritten signature in cursive script, appearing to read "M. Tidwell", written over a horizontal line.

Michael T. Tidwell

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