

DOCKET SECTION

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

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

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LION TO QUESTION POSED
ON ORAL CROSS EXAMINATION
(OCA/USPS-T24-1)

The United States Postal Service hereby provides the response of witness Lion to a question posed in oral cross examination on October 7. Tr. 3/1192-93.

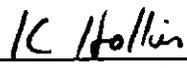
The question is paraphrased succinctly and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
October 17, 1997

QUESTION:

Refer to Attachment 1 to OCA/USPS-T24-42. Please confirm that the 30 data points in Group A represent 30 different ZIP Codes. See Tr. 3/ 1192-1193.

RESPONSE:

Not confirmed. The 30 data points represent 30 facilities, but only 23 distinct

ZIP Codes. They are broken down as follows:

<u>ZIP Codes</u>	<u>Occurrences</u>	<u>Facilities</u>
1	3	3
5	2	10
<u>17</u>	1	<u>17</u>
23		30

DECLARATION

I, Paul M. Lion, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul M Lion

Dated: 10/17/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

K Hollies

Kenneth N. Hollies

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