

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

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Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE
(October 20, 1997)

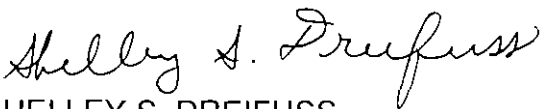
Pursuant to the Presiding Officer's Ruling No. R97-1/4, the Office of the Consumer Advocate hereby designates the following responses of the Postal Service as the written cross-examination of the OCA, to be included in the record of this proceeding.

1. OCA Interrogatories 1, 3.a., 7. f. and g., 9-12, 15, 16, 17.b., 18, 19, 20.a. and b., 21-35, 39-41, 43, 54-61, 62 (revised), 63, 69, 74.c., 75.c., 79-83, and 86-97 .
2. AAPS Interrogatories 1-4.
3. ABA Interrogatory 1.
4. ABP Interrogatories 1-16.
5. ADVO Interrogatories 1-19 and 22-29.
6. ALA Interrogatory 3.
7. DFC Interrogatory 1.
8. DBP Interrogatories 5, 6, 8, 9, 13.h. - i., 14, 17-20, 23, 35, 40-42, 45, 55, and 65.
9. DMA Interrogatories 1-10.

10. MH Interrogatories 5.b., 6.a. and b., 7.a., 8.a., and 9.
11. MMA Interrogatories 1-6.
12. MPA Interrogatory 2.
13. NAA Interrogatories 1-20.
14. NDMS Interrogatories 1 and 2.
15. TW Interrogatories 1-4.
16. UPS Interrogatories 1-2, 4-15, 18-20, 21.b., and 22-40.
17. VP-CW Interrogatory 1.
18. Interrogatories responded to by the Postal Service upon redirection from:
 - a. Pafford (T1) NNA/USPS-T1-3-6; and UPS/USPS-T1-2.
 - b. Harahush (T3) OCA/USPS-T3-1.
 - c. Moden (T4) OCA/USPS-T4-20.b. - d. and 21-23; ABP/USPS-T4-11; DMA/USPS-T4-14.b.. 24.c. - e., 58, 63-84, 85.b. - d.; MPA/USPS-T4-1 and 2; NAA/USPS-T4-18-23 and 28; and NDMS/USPS-T4-9.
 - d. Alexandrovich (T5) MMA/USPS-T5-5, 6.a., and 7; MPA/USPS-T5-2.c. and d., and 3; UPS/USPS-T5-17-20.
 - e. Tolley (T6) NTC/USPS-T6-1.
 - f. Tayman (T9) UPS/USPS-T9-7-10.
 - g. Degen (T12) OCA/USPS-T12-44-49, 50.c.ii. and iv., and 51-55.
 - h. Bradley (T13) OCA/USPS-T13-29.a. and c., 37b.iii. - b.x.; ABP/USPS-T-13-3, 4, 6, 7.c., 8.b. and d. - g.; FGFS/USPS-T13-53; and UPS/USPS-T13-27.b. and 36.
 - i. Bradley (T14) OCA/USPS-T14-15.d., DMA/USPS-T14-34 and 46; NAA/USPS-T14-20; and UPS/USPS-T14-4, 10, 43, 44.b., 57, 59, and 60.
 - j. Patelunas (T15) UPS/USPS-T15-5-7 and 9.

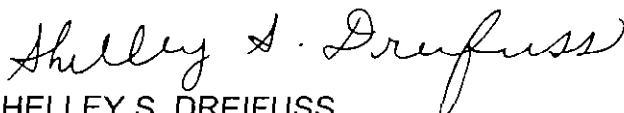
- k. Hatfield (T16) FGFSA/USPS-T16-17.b. - e.
- l. Baron (T17) MPA/USPS-T17-8-12.
- m. Wade (T20) UPS/USPS-T20-4-16.
- n. Miller (T23) OCA/USPS-T23-1, 2 and 8-11.
- o. Lion (T24) OCA/USPS-T24-31.b. - d., 32, 35, 37, 48-58, 73.a., and 92.e.
- p. Hatfield (T25) ABA&EEI&NAPM/USPS-T25-5, 10, 12, 16-20, 23-25, and 28; and MMA/USPS-T25-1.b. and c., and 11.
- q. Seckar (T26) TW/USPS-T26-1.b.
- r. Schenk (T27) NDMS/USPS-T27-2.b. and c., 3, and 4.b. and c.
- s. Daniel (T29) OCA/USPS-T29-6 and 7; ABA&EEI&NAPM/USPS-T29-11 and 15; APWU/USPS-T29-1; and UPS/USPS-T29-11.
- t. O'Hara (T30) ABA&EEI&NAPM/USPS-T30-5; DMA/USPS-T30-6; MMA/USPS-T30-3.a., 4.a. and d., 6, 7.a.2., 8.c.1. and 3; MH/USPS-T30-2a. - d.; and NNA/USPS-T30-3 and 4.
- u. Fronk (T32) OCA/USPS-T32-1.b. - e., 7-18, 20, 21, 27-30, 32, 36, 38-40, 43, 45-47, 50-55, 56.a. and b., 57.a. and c., 59-61, 63.c., 64.a. - d. and f., 65, 68, 69.a., 70, 74. a. and b., 75, 77, 78, 80, 81, 83, 84, 85.a., c. and d., 87, 88, 89.b. and c. 97.a., 98. a. and c., 101, 102.b. - e., 103, 109-115, 119-124, 125.a., 126 and 130; ABA&EEI&NAPM/USPS-T32-4, 5.c., 7.a., and 8; MMA/USPS-T32-1, 2, 11, 12, 15.b., 17, 24.b., 25, and 27; NDMS/USPS-T32-2.e., 8-11, 15, 17, 18.c. - e., 19, 20, 24, 26-28, 29.a, b., and d., 30-31, 33.b. - d., 34, 37.d., 38, 43-51, and 52 (revised).
- v. Sharkey (T33) NDMS/USPS-T33-28 and 29; UPS/USPS-T33-61-65 and 72.
- w. Moeller (T36) AAPS/USPS-T36-7-11; MMA/USPS-T36-8, 10, and 11; MOAA/USPS-T36-1; NAA/USPS-T36-17-27, 29-31, and 47; and VP-CW/USPS-T36-11-14.
- x. Mayes (T37) OCA/USPS-T37-1-4 and 7.d.; PSA/USPS-T37-10; and UPS/USPS-T37-14, 57, 58, 60, 61, 68, 70-73, and 75.
- y. Takis (T41) AAPS/USPS-T41-3.b. - e.; and UPS/USPS-T41-35.

Respectfully submitted,


SHELLEY S. DREIFUSS
Attorney

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

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October 20, 1997