DOCKET SECTION

No. 3 BATRACES AT 1

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 (OCA/USPS-101) October 21, 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 an interrogatory and request 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 A. Drufuss SHELLEY S. DREIFUSS

Attorney

THE REP

Docket No. R97-1

OCA/USPS-101. The following questions refer to the likely implementation date assumed by several Postal Service witnesses.

- (1) Please refer to October 16, 1997, Tr.9/4584, lines12-14, where witness Tayman states "the assumption that the rates as filed" will be implemented "in June of '98."
- (2) Please refer to the testimony of witness Tolley, (USPS-T-6) at page 4, lines14-15, where he states, "After-rates Test Year volumes are projected assuming that proposed rates will be implemented on October 1, 1997."
- (3) Please refer to the response of witness Lion to OCA/USPS-T24-96, where he states, "the 'implementation date' [] has not been determined."
- a. The three statements concerning the "implementation date" for the proposed rates appear to be inconsistent. Please reconcile them.
- b. Please confirm that the Postal Service assumes that there will be multiple implementation dates for proposed rates in this proceeding. If you do not confirm, please explain, and state whether the Postal Service assumes that there will be one implementation date for all proposed rates.
- c. Please confirm that the Postal Service assumes that proposed rates in this proceeding will be implemented in fiscal year 1998. If you do not confirm, please explain.

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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.

Shelly A. Drufuss SHELLEY S. DREIFUSS

Attorney

Washington, D.C. 20268-0001 October 21, 1997