

# DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

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

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE  
OF RESPONSE TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T32-76)**

The United States Postal Service filed today its response to the following interrogatory, dated September 2, 1997: OCA/USPS-T32-76.

The response was due to have been filed on September 16, 1997. Originally directed to witness Fronk, the interrogatory does not pertain to his testimony. Upon receipt of the interrogatory, witness Fronk immediately began the process of contacting postal personnel who he believed could lead him to responsive information. Although the trail grew cold several times, he persisted and finally identified several persons who were believed to possess such information. Tracking these individuals down proved to be much more of a chore than anticipated<sup>1</sup> and was interrupted by his need to prepare for and participate in hearings several weeks ago.

Finally, responsive documents were produced and reviewed by witness Fronk. After he reviewed them, he passed them on to undersigned counsel who, because of the press of recent motion practice, was unable to review them until this weekend. That review has been completed. The responsive documents have been compiled in USPS Library Reference H-303, which was filed today.

Consistent with the September 12, 1997, objection to OCA/USPS-T32-76(b),

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<sup>1</sup> The search was complicated by the fact that the task force which generated the responsive materials no longer functions.

information in that library reference which would identify certain mailers or postal facilities has been redacted.

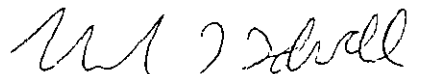
The Postal Service regrets the delay in its response to this interrogatory and wishes to make it clear that witness Fronk's diligence is the sole reason that responsive information was located at all.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

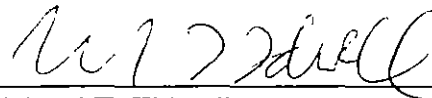


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October 27, 1997

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.



Michael T. Tidwell

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October 27, 1997