

DOCKET SECTION

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

RECEIVED

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

SECOND REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
PATELUNAS TO INTERROGATORY OF NASHUA PHOTO INC., DISTRICT PHOTO
INC., MYSTIC COLOR LAB AND SEATTLE FILMWORKS, INC.
(NDMS/USPS-T15-1)

The United States Postal Service hereby provides a revised attachment to the response of witness Patelunas to the following interrogatory of Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc.: NDMS/USPS-T15-1, filed on September 17, 1997. The original response was filed on September 29, 1997, and the revised response was filed on October 16, 1997. Only the revised attachment is included.

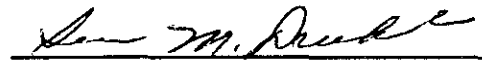
The revisions are made as a result of questions raised in oral cross-examination of witness Patelunas on October 22, 1997. See *Tr. 13/7308-09*. The revisions are to line 19 of columns 6 through 10 only.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

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

Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 31, 1997

Priority Mail Transportation

| Line | Column=> | Absolute Total Change | | | | | Percent Change of Total | | | | |
|------|----------|-----------------------|-------------|----------|-----------|-----------|-------------------------|-------------|----------|-----------|------------|
| | | Air (1) | Highway (2) | Rail (3) | Water (4) | Total (5) | Air (6) | Highway (7) | Rail (8) | Water (9) | Total (10) |
| 1 | 96MODS | 383,497 | 139,622 | 2,806 | 430 | 526,355 | | | | | |
| 2 | | | | | | | | | | | |
| 3 | CL | 25,426 | 4,901 | 33 | 14 | 30,374 | 9.52% | 1.84% | 0.01% | 0.01% | 11.38% |
| 4 | MV | 53,073 | 18,757 | 368 | 58 | 72,256 | 19.88% | 7.03% | 0.14% | 0.02% | 27.06% |
| 5 | NV | 0 | 0 | 0 | 0 | 0 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 6 | AD | 0 | 0 | 0 | 0 | 0 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 7 | CR | -21,218 | 0 | 0 | 0 | -21,218 | -7.95% | 0.00% | 0.00% | 0.00% | -7.95% |
| 8 | OP | 32,748 | 6,851 | 0 | 0 | 39,599 | 12.27% | 2.57% | 0.00% | 0.00% | 14.83% |
| 9 | | | | | | | | | | | |
| 10 | 97RCR | 473,526 | 170,131 | 3,207 | 502 | 647,366 | 33.72% | 11.43% | 0.15% | 0.03% | 45.32% |
| 11 | | | | | | | | | | | |
| 12 | CL | -13,922 | 2,382 | 92 | 14 | -11,434 | -5.21% | 0.89% | 0.03% | 0.01% | -4.28% |
| 13 | MV | 28,143 | 10,563 | 202 | 32 | 38,940 | 10.54% | 3.96% | 0.08% | 0.01% | 14.58% |
| 14 | NV | 0 | 0 | 0 | 0 | 0 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 15 | AD | 0 | 0 | 0 | 0 | 0 | 0.00% | 0.00% | 0.00% | 0.00% | |
| 16 | CR | -83,843 | -2,463 | 0 | 0 | -86,306 | -31.40% | -0.92% | 0.00% | 0.00% | -32.32% |
| 17 | OP | 100,000 | 104,791 | 0 | 0 | 204,791 | 37.45% | 39.25% | 0.00% | 0.00% | 76.70% |
| 18 | | | | | | | | | | | |
| 19 | 98RCB | 503,904 | 285,404 | 3,501 | 548 | 793,357 | 45.10% | 54.60% | 0.26% | 0.04% | 100.00% |
| 20 | | | | | | | | | | | |
| 21 | Change | 120,407 | 145,782 | 695 | 118 | 267,002 | | | | | |
| 22 | % Change | 31.40% | 104.41% | 24.77% | 27.44% | 50.73% | | | | | |

Sources:
 Cols (1-4) Lines (1-10) USPS-T15 WP-A
 Cols (2-4) Lines (11-20) USPS-T15 WP-F
 Col (1) Lines (11-20) reflecting Attachment I, second revised response to UPS/USPS-T33-36 redir. from Witness Sharkey
 Col (5) Lines (1-19) = Sum cols(1-4)
 Cols (1-5) Line 21 = Line 19 - Line 1
 Cols (1-5) Line 22 = Line 21 / Line 3
 Cols (6-10) = relevant change portion / total change

DECLARATION

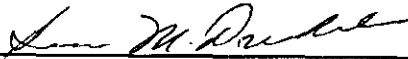
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

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

Dated: 10/31/97

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.



Susan M. Duchek

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October 31, 1997