

DOCKET SECTION

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

RECEIVED
Nov 13 4 54 PM '97

POSTAL RATE AND FEE CHANGES, 1997

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORIES OF
DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-86, 87, AND 90)

The United States Postal Service hereby provides responses of witness Plunkett to the following interrogatories of David B. Popkin: DBP/USPS-86, 87, and 90, filed on November 10, 1997, and redirected from the Postal Service.

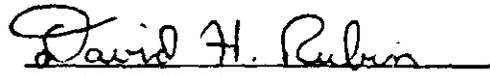
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
November 13, 1997

RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF DAVID B. POPKIN REDIRECTED FROM THE
POSTAL SERVICE

DBP/USPS-86 In your response to DBP/USPS-73, confirm, or explain if you are unable to do so, that the sender's option of waiving the customer's signature also applies to Express Mail.

DBP/USPS-86 Response:

See Tr. 3/967.

RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF DAVID B. POPKIN REDIRECTED FROM THE
POSTAL SERVICE

DBP/USPS-87 In your response to DBP/USPS-77 - subpart g, confirm, or explain if you are unable to do so, that a detached mail unit is an activity which is operated by Postal employees at the addressee's location.

DBP/USPS-87 Response:

Detached mail units (DMU) are units that are located "off-site" i.e. not on the premises of Postal Service facilities. For the instant case, the DMU is operated by Postal employees at the addressee's location, though DMUs are often located in mailers' facilities.

RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF DAVID B. POPKIN REDIRECTED FROM THE
POSTAL SERVICE

DBP/USPS-90 Please respond to my original interrogatory DBP/USPS-80.

Insured mail which can have an insurance value of \$5,000 refers to insured mail
and not to registered mail as offered by the witness.

DBP/USPS-90 Response:

See Tr. 3/980-982, which applies to insured mail with a value of \$5,000.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

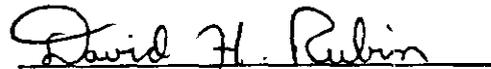


MICHAEL K. PLUNKETT

Dated: November 13, 1997

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.


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 13, 1997