

DOCKET SECTION

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

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

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE MCGRAW HILL COMPANIES, INC. WITNESS HEHIR
(USPS/MH-T1-1-3)

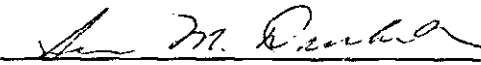
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to The McGraw Hill Companies, Inc. witness Hehir: USPS/MH-T1-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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January 20, 1998

USPS/MH-T1-1. Please refer to your testimony on page 8, line 9.

(a) Please provide your understanding of the term “chronically underutilized”.

(b) Please provide all analyses you have conducted of the Postal transportation network.

(c) Is it your understanding that the customers of the Postal Service would be better served (i.e. served at lower cost) if the cube utilization of purchased highway transportation were higher. Please explain.

USPS/MH-T1-2. Please provide all documents you reviewed in preparation of your testimony.

USPS/MH-T1-3. In your testimony (page 8, lines 11-17) you state that the Postal Service “has not studied” whether the costs of unutilized capacity is volume variable. And you cite witness Bradley’s testimony in support of this statement.

(a) Do you regard the testimony of postal operations experts on this very issue as being irrelevant?

(b) Are you familiar with the term latent capacity? If so, please explain the source(s) of your familiarity.

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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