

# DOCKET SECTION

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

RECEIVED

JAN 27 4 45 PM '98

POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE AND FEE CHANGES  
DOCKET NO. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
NIAGARA TELEPHONE COMPANY WITNESS PETERSON  
(USPS/NTC-T1-1-9)

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 Niagara Telephone Company witness Peterson: USPS/NTC-T1-1-9.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2970; Fax -5402  
January 27, 1998

USPS/NTC-T1-1. On page 1, in paragraph 2 of your testimony, you describe an operational pattern for handling certain mail, whereby that mail is only handled in the local facility.

- a. To which facility does this portion of your testimony refer?
- b. Please specify the volume of mail that is handled as you describe at the facility you identify in subpart a of your response.
- c. Have you conducted any studies or research to determine whether this operational procedure is followed at facilities other than the one you describe in paragraph two of your testimony?
- d. If so, please describe your study methods, and provide the results of any such studies.
- e. Please state the time frames during which you conducted any such studies.

USPS/NTC-T1-2. At page 1, paragraph 4 of your testimony, you indicate that you have examined more than 100 post offices.

- a. Please list those offices, including their city, state and ZIP code.
- b. Please indicate the dates on which you examined these offices. If you cannot specify an exact date, please provide an estimate.
- c. Please fully describe your "examination" of these offices.
- d. Have you observed the operations at any large mail processing facilities since your testimony in MC95-1? If so, please indicate which facilities, the date(s) of your visit, and the names and job titles of the Postal Service personnel with whom you spoke.

USPS/NTC-T1-3. At page 1, paragraph 4 of your testimony, you refer to “one of the Post Office's interrogatory responses.” Please indicate a specific citation for this interrogatory response, including the Postal Rate Commission docket number of the proceeding in which it was answered.

USPS/NTC-T1-4. At pages 1-2, paragraph 4 of your testimony, you refer to a Postal Transmittal Letter TL-12, 11-18-74, Issue 90. Please provide a copy of this document.

USPS/NTC-T1-5. Is it your testimony that the Postal Rate Commission should adopt the two subclasses that you propose, Local Mail and Non-Local Mail, as alternatives to the current rate structure for First Class Mail?

- a. If your answer is other than an unqualified affirmative, please explain fully.
- b. If your response to the above question is affirmative, have you prepared Domestic Mail Classification Schedule language for your two new subclasses of First Class Mail?

USPS/NTC-T1-6. Attachment A to your testimony depicts two pieces of mail which bear cancellation dates in 1946. Please indicate all the ways in which you understand the Postal Service's operational methods have changed since 1946.


USPS/NTC-T1-7. What volume of mail would you estimate would qualify for your Local Mail subclass? Please provide all calculations you use in arriving at your estimate.

USPS/NTC-T1-8. Please indicate your estimate of the revenue consequences for the Postal Service if the Postal Rate Commission were to recommend, and the Postal Service's Governors were to approve, the classification structure that you advocate.

USPS/NTC-T1-9. Is it your testimony that mail deposited in "local only" mail slots are always simply placed "in a recipient's post box or in a mail carrier's bag," as you describe at page 3, paragraph 7 of your testimony? Please state all bases for your response.

## 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.

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
January 27, 1998