

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

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Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
DESIGNATION OF WRITTEN CROSS-EXAMINATION  
(March 26, 1998)

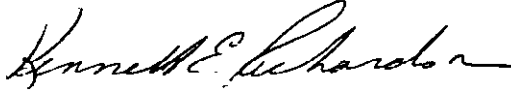
Pursuant to the direction of the Presiding Officer on March 17, 1998 (Tr. 33/17356), the Office of the Consumer Advocate hereby designates the following responses of the parties as the written cross-examination of the OCA, to be included in the record of this proceeding:

1. OCA/USPS Interrogatories 120-125;
2. OCA/USPS Interrogatory of witness Bradley, ST-55-1;
3. OCA/UPS Interrogatory of witness Neels, ST1-1;
4. OCA/USPS Interrogatories of witness Fronk, T32-2-6, answered institutionally by the Postal Service.<sup>1</sup>

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<sup>1</sup> OCA realizes its request for inclusion of the Fronk interrogatory responses is untimely. Prior failure to designate these responses was not discovered until after Postal Service rebuttal testimony was filed and brief writing had commenced. OCA had intended to designate these responses in timely fashion, but failed to do so because of the (understandably complex) way in which OCA's interrogatories to Postal Service witness Fronk were answered. Many of the interrogatories directed to witness Fronk were answered by the Postal Service institutionally. They were not answered in order, and sometimes not in timely fashion. As partial examples of this complexity, we note the following: the subject interrogatories were part of a document that offered responses to OCA/USPS-T32-2-7, 11, 17, 18, 20, 21, 27-30, 38-40, 51 and 52; another document contained the Responses to OCA/USPS-T32-32, 43, 46, 47, and 50, filed 11 calendar days late; and another document contained the responses to OCA/USPS-T32-57a and

Respectfully submitted,



KENNETH E. RICHARDSON  
Attorney

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.



KENNETH E. RICHARDSON  
Attorney

Washington, D.C. 20268-0001  
March 26, 1998

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c, 59-61, 63c, 64a-d and f, 69a, 70, 74a and b, 75, 78, 80, 81, 83, 84, 85a, c and d, 87, 88, 89b and c, 98a and c, 101, 102b-e, and 103.