

ORIGINAL

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

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Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: JOHN HAMM
(OCA/USPS-T6-3-8)
(July 31, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

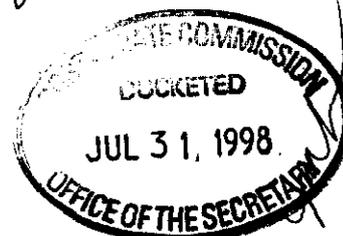
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

Shelley S. Dreifuss
Attorney



OCA/USPS-T6-3. Please refer to page ii of your testimony. You state that PIA represents 15,000 printing and graphic arts businesses in the United States.

- a. Please give a ballpark estimate of the total number of such businesses in the United States, whether they are members of PIA or not.
- b. Generally, are businesses that primarily provide photocopying services among your members?

OCA/USPS-T6-4. At page 1 of your testimony, you state that “shorter print runs” and “greater specialization in printing” are part of the digital printing revolution. Is it mainly the reduced costs of producing a shorter print run or specialized print jobs that have resulted in an increase in the number of such jobs? Please explain.

OCA/USPS-T6-5. At the bottom of page 1, you refer to “on demand” printing.

- a. Please explain what this means.
- b. How widespread is “on demand” printing?

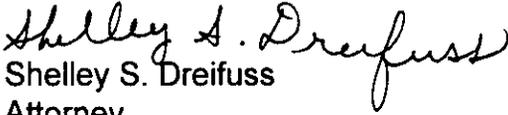
OCA/USPS-T6-6. At page 2, line 14, you state that, “The transmission of this document can be done in real time for printing and mailing.” Please explain what you mean by this—if a document can be done in real time now, how was it done before?

OCA/USPS-T6-7. Please explain what you mean at page 3, line, 1, that, “Each press has points of efficiency.”

OCA/USPS-T6-8. Please define and describe a “digital printing unit” as you use that phrase at page 3 of your testimony.

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.


Shelley S. Dreifuss
Attorney

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