

The term "documents" includes, but is not limited to, letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable, diligent efforts, including without limitation, all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions, and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms

"workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

ABA&EEI&NAPM\USPS-T30-1.

Please identify any portion of the projected revenue of the USPS for the test year in this proceeding which is attributable to any amount for fees received by the USPS for Forward Address Correction Requested, Address Correction Service, National Change of Address, or FASTFORWARDSM. Please specifically identify where in the USPS testimony such revenue is set forth, the amount of such revenue, and the assumptions underlying the calculation of such revenue, including any increases due to implementation of move update requirements.

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Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
EDISON ELECTRIC INSTITUTE, INC.
NATIONAL ASSOCIATION OF PRESORT MAILERS

By: 

Henry A. Hart, Esq.
Hazel & Thomas, P.C.
510 King Street
Suite 200
Alexandria, VA 22314
Ph. 703-838-5153
Fax: 703-836-8062

Irving D. Warden
Assoc. General Counsel
American Bankers Association
1120 Connecticut Ave., NW
Washington, DC 20036
Ph: 202-663-5035
Fax: 202-828-4548

R. Brian Corcoran
Oliver & Oliver, P.C.
1090 Vermont Ave., NW
Suite 800
Washington, DC 20005
Ph. 202-371-5656
Fax: 202-289-8113

Counsel for
National Association
of Presort Mailers

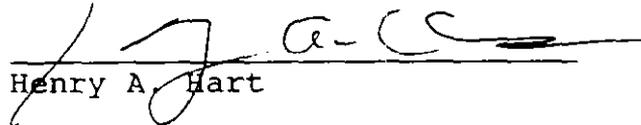
Counsel for
American Banker Association

Counsel for
Edison Electric Institute

Date: September 15, 1997
Alexandria, Virginia

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

September 15, 1997

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