

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T40-40), AND
REVISED RESPONSE OF WITNESS PLUNKETT TO QUESTION OF THE
OFFICE OF THE CONSUMER ADVOCATE POSED AT THE OCTOBER 7 HEARING

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T40-40, filed on October 17, 1997. In conjunction with this response, the Postal Service also provides the revised response of witness Plunkett to a question posed by the Office of the Consumer Advocate at the hearing on October 7, 1997.

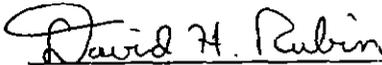
Each question is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
October 22, 1997

RESPONSE OF U.S. POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-40. Please refer to Response of United States Postal Service Witness Plunkett to Questions Posed at October 7, 1997 Hearing, filed October 15, 1997. In response to OCA's question concerning the number of insurance claims made in FY 1996, you replied: "In FY 96, 65,996 insurance claims were filed." However, Table 1 in your direct testimony (see page 6) indicates that in FY 1996 a total of 50,037 "lost" claims were paid and 50,768 "damaged" claims were paid. Please clarify and reconcile this data.

OCA/USPS-T40-40 Response:

See my revised response to question (at Tr. 3/1047) posed at hearing on October 7, 1997. The original response related to "lost" claims only.

REVISED RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO
QUESTION OF THE OFFICE OF THE CONSUMER ADVOCATE AT THE
HEARING ON OCTOBER 7, 1997

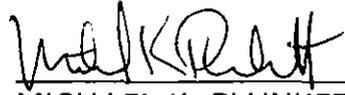
Question (Tr. 3/1047): Will the Postal Service be willing to provide [the number of insurance claims made in FY 96]?

RESPONSE:

In FY 96, 122,753 insurance claims were filed.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

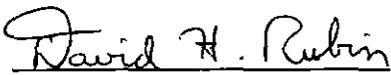


MICHAEL K. PLUNKETT

Dated: 10/22/97

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.



David H. Rubin

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Washington, D.C. 20260-1137
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