

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

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POSTAL RATE AND FEE CHANGES, 1997  
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Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

THE AMERICAN BUSINESS PRESS' FOLLOW-UP  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO USPS WITNESS O'HARA  
(ABP/USPS-T30-8)

Pursuant to Special Rules of Practice Section 2D, the American Business Press hereby submits the attached follow-up interrogatories and requests for production of documents to USPS Witness O'Hara (ABP/USPS-T30-8). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

  
Stephen M. Feldman

Dated: September 5, 1997

FOLLOW-UP INTERROGATORIES  
OF AMERICAN BUSINESS PRESS (ABP)  
TO USPS WITNESS O'HARA (USPS-T30)

ABP/USPS-T30-8

In response to ABP/USPS-T30-5, you assert that your testimony as to the "moderately high" value of service afforded to periodicals is based upon actual service, not service standards. Yet you also state that the Postal Service has no nationally representative data on actual service.

[a] Why has the Postal Service failed to collect such service data for periodicals?

[b] How can you assess the quality of service actually given to periodicals when you have no service data?