

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**Major Mailers Association's
First Set Of Interrogatories and Document Production Requests To
United States Postal Service Witness Marc A. Smith (MMA/USPS-T13-1-2)
(June 12, 2006)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association submits the following interrogatories and document production requests to United States Postal Service Witness Marc A. Smith (MMA/USPS-T13-1-2).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
June 12, 2006**

MMA/USPS-T13-1

Please refer to Library Reference USPS-LR-L-99, which uses the PRC attributable cost methodology to derive cost pools in much the same way that Library Reference USPS-LR-L-53 does using the Postal Service's attributable cost methodology. It appears that several columns are missing on tab page "Letters (4)." Please explain why these columns are missing and provide an Excel file with those columns included.

MMA/USPS-T13-2

Please refer to page 40 of your direct testimony where you indicate that USPS witness Taufique discusses the Postal Service's reason for including costs for single piece metered mail in Library Reference USPS-LR-L-99, which is based on the Commission's attributable cost methodology, but not in Library Reference USPS-LR-L-53, which is based on the Postal Service's attributable cost methodology. Please state exactly where in witness Taufique's direct testimony this topic is discussed and explain why the unit costs for single piece metered mail were excluded from Library Reference USPS-LR-L-53.