

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MMA WITNESS BENTLEY
(USPS/MMA-T1-54-56)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Major Mailers Association witness Richard E. Bentley (USPS/MMA-T1-54-56).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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December 17, 1996



USPS/MMA-T1-54. Please refer to your response to USPS/MMA-T1-44. Please provide a responsive answer to subparts (b) through (d). As stated in the original interrogatory, the quotation in subpart (d) contained an incomplete last sentence. For your convenience in answering, subparts (b) through (d) of USPS/MMA-T1-44 are reproduced below as subparts (a) through (c), respectively, with the complete, corrected sentence at the end of former subpart (d), now subpart (c), of this interrogatory.

- a. If your Docket No. R94-1 analysis was not prepared until November 18, 1996, then please explain in detail why Major Mailers Association stated in its September 24, 1996 Motion for Limited Extension of Time to File Testimony and Request for Shortened Answering Period, that the data from PRC-LR-1 and 2 "effectively supersede the data MMA used in its original prepared testimony. Now that these new data are available, it makes no sense to have MMA submit its testimony as originally prepared."
- b. If your Docket No. R94-1 analysis was not prepared until November 18, 1996, then please explain in detail why you testified: "Yes. I was basically finished with my analysis and when this updated information came on, I felt I would have been embarrassed to file my testimony by ignoring it, so I wanted to incorporate it. . . . Once the new data came out, I saw no need to put in the older data." Tr. 6/2044-45.

- c. If your Docket No. R94-1 analysis was not prepared until November 18, 1996, then please explain in detail why Major Mailers Association stated in its November 25, 1996 Response to United States Postal Service's "Supplemental Comments" to Motion to Strike MMA Witness Bentley's "New Analysis": "This conclusion was contained in the draft of his testimony that Mr. Bentley prepared before the Commission issued PRC-LR-1 and LR-2. At that time, Mr. Bentley illustrated his conclusion with data from Docket No. R94-1 (*Id.* at 6:2042). After the Commission issued PRC-LR-1 and LR-2, Mr. Bentley revised his testimony to substitute the PRC-LR-1 and LR-2 data for the R94-1 data."

USPS/MMA-T1-55. Please refer to your response to MMA/USPS-T1-44(e) and the attachment.

- a. Please confirm that the column 2 figures used in your attachment, page 2 of 2, are from Exhibit USPS/MMA-1G from Docket No. R94-1. If you do not confirm, please explain in detail.
- b. Please confirm that the attributable costs contained in Exhibit MMA-1G from Docket No. R94-1 represent an approximation of test year after rates finances using the Commission's R90-1 cost attributions. If you do not confirm, please explain in detail.

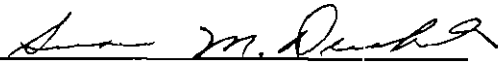
- c. In preparing this analysis for your testimony as originally planned, why did you use the attributable cost figures from Exhibit MMA-1G from Docket No. R94-1 rather than the attributable costs from the Commission's initial Recommended Decision in Docket No. R94-1? Please explain in detail.
- d. In preparing this analysis for your testimony as originally planned, why did you use the attributable cost figures from Exhibit MMA-1G from Docket No. R94-1 rather than the attributable costs from the Commission's Further Recommended Decision in Docket No. R94-1? Please explain in detail.

USPS/MMA-T1-56. Please refer to your responses to MMA/USPS-T1-42 and 43. Sheets 4 and 5 of MMAUSPS.XLS already provide the information contained in MMA11.XLS and MMA12.XLS.

- a. What was the purpose of referring to MMA11.XLS and MMA12.XLS in the cells of MMAUSPS.XLS? Please explain in detail.
- b. Which spreadsheets were prepared first -- MMAUSPS.XLS, MMA11.XLS, and MMA12.XLS? Please list the order in which these three spreadsheets were prepared and specify the date of preparation of each.

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.


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