

**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

Docket No. R2000-1

**MAJOR MAILERS ASSOCIATION'S
FIRST SET OF INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS
TO USPS WITNESS LINDA A. KINGSLEY**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to United States Postal Service witness Linda A. Kingsley: **MMA/USPS-T10-1-2**. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION

By: 

Michael W. Hall
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Counsel for
Major Mailers Association

Dated: Round Hill, VA
February 9, 2000

**Major Mailers Association's First Set Of Interrogatories
And Requests For Production Of Documents
To USPS Witness Linda Kingsley**

MMA/USPS-T10-1 On page 8 of your prepared testimony, you indicate that almost 71% of the total letter mail barcodes were provided by mailers in AP13 of FY99.

- (a) Please provide the breakdown of that 71% among Standard Mail (A), First-Class Presorted, and First-Class Single Piece.
- (b) Do you know what percent of the First-Class Single Piece prebarcoded letters were prebarcoded, automation compatible reply pieces that were sent to nonpresort mailers inside First-Class presorted envelopes?
- (c) Are the Postal Service's barcoding capabilities at or near their peak operating capacity? If not, what additional percentage of total barcodes could the Postal Service provide before its existing systems and equipment reached capacity?
- (d) By the beginning of the Test Year, how much money will the Postal Service have spent on the equipment that makes up the Remote Bar Coding System?
- (e) During the Test Year, how much money will the Postal Service spend on implementing the Remote Bar Coding System?

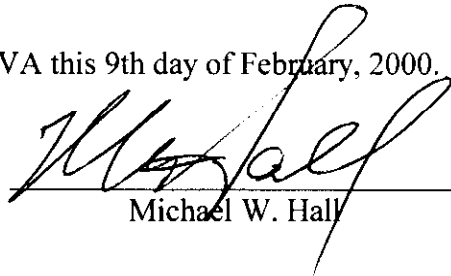
MMA/USPS-T10-2 Please refer to page 8 of your prepared testimony, where you state "[c]ustomer incentives have produced substantial growth in prebarcoded letters."

- (a) Please identify all the "customer incentives" that you are referring to, state when the incentive was first implemented, and provide all documents that quantify or discuss the extent to which such incentives have contributed to the growth in prebarcoded letters.
- (b) Please identify any additional customer incentives that the Postal Service is considering implementing in order to generate additional growth in prebarcoded letters, state when you expect such customer incentives to be implemented, and provide all documents that quantify or discuss the extent to which the Postal Service expects such additional incentives will contribute to the growth in prebarcoded letters.
- (c) Does the term "customer incentive," as you have used it in the referenced portion of your prepared testimony, include the Postal Service's requirement that First Class mailers who want to include reply envelopes in their outgoing automation letters must apply prebarcodes to such reply envelopes?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, Ted P. Gerarden, Director of the Office of the Consumer Advocate, and participants who requested service of all discovery documents, in compliance with Rules 12, 25, and 26 of the Commission's Rules of Practice And Procedure.

Dated at Round Hill, VA this 9th day of February, 2000.



Michael W. Hall