

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS ROBINSON**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Robinson: DMA/USPS-T34, No. 1. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

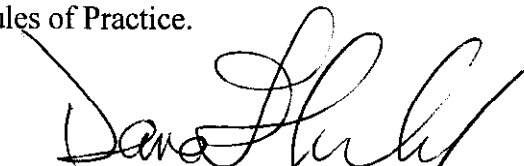


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Counsel for the Direct Marketing
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CERTIFICATE OF SERVICE

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



Dana T. Ackerly II

Dated: February 16, 2000

DMA/USPS-T34-1. Please refer to footnote 1 on page 14 of the Domestic Mail Rate History (USPS-LR-I-118), which states, “pieces presented in mailings of at least 300 pieces and meeting applicable Postal Service regulations for presorted Priority Mail receive a 11-cent per piece discount”. Please also refer to lines 4-5 on page 7 of your testimony (USPS-T-34) where you state, “the Priority Mail presort discount was eliminated in January 1999 following Docket No. R97-1.”

- a. Please confirm that prior to January 1999 an 11-cent discount was given for presorted mailings of at least 300 pieces that met "applicable Postal Service regulations" for presorted Priority Mail. If not confirmed, please explain.
- b. Please describe in detail these "applicable Postal Service regulations" for presorted Priority Mail.
- c. Please describe in detail the method the USPS used to estimate the cost savings resulting from presortation that formed the basis for the 11-cent discount.
- d. How large was the presort cost savings that formed the basis for the Priority Mail presort discount? Please provide the cost savings figure as well as all underlying calculations in an electronic spreadsheet.
- e. Using the method described in your response to part (c), what would the Priority Mail presort cost savings be in the Test Year for this case? Please provide the cost savings figure as well as all underlying calculations in an electronic spreadsheet.
- f. Has the USPS estimated the cost savings that would result from dropshipping Priority Mail to DBMCs, DSCFs, or any other destination facility (e.g., Destination PMPC)? If so, please describe the cost estimating methodology and provide all relevant cost savings figure and all underlying calculations in an electronic spreadsheet.