

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, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS THRESS TO INTERROGATORY OF  
MAJOR MAILERS ASSOCIATION,  
REDIRECTED FROM WITNESS FRONK  
(MMA/USPS-T33-6(c))

The United States Postal Service hereby provides the response of witness Thress to the following interrogatory of the Major Mailers Assoc., redirected from witness Fronk: MMA/USPS-T33-6(c), filed on February 10, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Eric P. Koetting

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February 24, 2000

**RESPONSE OF POSTAL SERVICE WITNESS THRESS TO  
INTERROGATORIES OF MAJOR MAILERS' ASSOCIATION  
REDIRECTED FROM WITNESS FRONK**

**MMA/USPS-T33-6 (c) Has the Postal Service studied at what point and to what extent First-Class Automation mailers would lose their incentive to workshare, cease presorting and prebarcoding their letter mail, and begin entering letters into the postal system as single piece mail? If yes, please provide all information that the Postal Service has developed on this subject.**

**RESPONSE:**

**For a discussion of the relationship between the volumes of single-piece and workshared First-Class letters and First-Class worksharing discounts, please see my testimony (USPS-T-7), particularly at pages 13 through 16. The Postal Service has not attempted to identify a level for the average First-Class worksharing discounts below which all worksharing would cease. If the Postal Service were going to eliminate worksharing, I assume that they would simply eliminate all relevant worksharing discounts, as opposed to setting discounts at a level where they exist but elicit no worksharing.**

DECLARATION

I, Thomas Thress, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Th Thress', written over a horizontal line.

(Signed)

2-23-00

(Date)

**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.



Eric P. Koetting

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