

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

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POSTAL RATE AND FEE CHANGES

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

**Major Mailers Association's First Set Of Institutional Interrogatories  
And Requests For Production Of Documents  
To The United States Postal Service**

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 the United States Postal Service: MMA/USPS-1. Please direct them to the appropriate witness or person 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 25, 2000

**Major Mailers Association's First Set Of Institutional Interrogatories  
And Requests For Production Of Documents  
To The United States Postal Service**

**MMA/USPS** Please refer to the Executive Summary of the Address Deficiency Study which appears at the following Uniform Resource Locator:  
<http://ribbs.usps.gov/files/uaa/uaasum.pdf>.

- (a) Please confirm that the referenced study was performed during 1998 by PricewaterhouseCoopers for the Postal Service Office of Address Management. If you cannot confirm, please explain why not.
- (b) Please provide a copy of the complete Address Deficiency Study.
- (c) Please confirm that the term "Move Update" refers to Postal Service programs whose objective is to make sure that customers' address lists are kept up-to-date. If you cannot confirm, please explain
- (d) Please confirm that "Move Update" programs include the following:
  - (1) National Change of Address (NCOA);
  - (2) FAST forward (MLOCR and MLC);
  - (3) Address Change Service (ACS); and
  - (4) Computerized Forwarding Systems (CFS).
- (e) Please state which of the Move Update programs listed in part (d) must be utilized by First-Class Automation mailers in order for them to remain eligible for discounted First Class rates?
- (f) Please confirm that the term "Address Quality" refers to Postal Service programs whose objective is to make sure that customers' addresses are of sufficient quality and accuracy to be read by automated equipment. If you cannot confirm, please explain.
- (g) Please confirm that "Address Quality" programs include the following:
  - (1) Delivery Sequence File (DSF);
  - (2) Address Element Correction (AEC);
  - (3) Coding Accuracy Support System (CASS);
  - (4) Multiline Accuracy Support System (MASS);
  - (5) Locatable Address Conversion System (LACS); and
  - (6) National Deliverability Index (NDI).
- (h) Please state which of those programs listed in part (g), must be utilized by First-Class Automation mailers in order for them to remain eligible for discounted First Class rates?

- (i) Please confirm that in 1998, it cost the Postal Service an average of 28.56 cents to process Undeliverable-As-Addressed (UAA) mail? See page 6 of the Executive Summary of the Address Deficiency Study. If you cannot confirm, please explain.
- (j) Please confirm that in 1998, "Move Update" and "Address Quality" programs saved the Postal Service at least \$1.505 billion because of reduced forwarding and return services that had to be provided? See page 7 of the Executive Summary of the Address Deficiency Study. If you cannot confirm, please explain.
- (k) Please confirm the following quote from page 8-9 of the Executive Summary of the Address Deficiency Study.

In 1997, the USPS introduced the Move Update requirement. The purpose of this requirement was to encourage customers to use mailing list maintenance practices that would maximize the number of First Class mail pieces that are deliverable as addressed. *The primary purpose is to maintain the focus on updating due to change-of-address.* The Move Update requirement requires mailers to select from one of the following four methods to remain eligible for discounted First Class rates:

- National Change of Address (NCOA)
- Address Change Service (ACS)
- FASTforward
- Ancillary Service Endorsements

- (l) Please confirm that, according to the Executive Summary of the Address Deficiency Study (p. 14), in 1998, 5.392% of all mail would have required forwarding and/or return service, but as a direct result of the Move Update programs, i.e. mailers checking and correcting their mailing lists, only 2.73% of all mail required such service. If you cannot confirm, please explain.
- (m) What was the average clerk/mailhandler hourly wage rate in FY 1998, comparable to the Test Year average rate of \$28.24 as provided in LR-I-106?

**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, the Designated Officer of the Commission, 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 this 25th day of February, 2000.

Michael W. Hall  
Michael W. Hall  
SB