

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

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES

Docket No. R2000-1

**MAJOR MAILERS ASSOCIATION'S FIRST SET OF
Follow-Up Interrogatories And Requests For Production Of Documents
TO USPS WITNESS DAVID R. FRONK**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following follow-up interrogatories to United States Postal Service witness David R. Fronk: **MMA/USPS-T33-FU-1**. 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/PS
Michael W. Hall
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Counsel for
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Dated: Round Hill, VA
March 3, 2000

**Major Mailers Association's First Set Of
Follow-Up Interrogatories And Requests For Production Of Documents
To USPS Witness David R. Fronk**

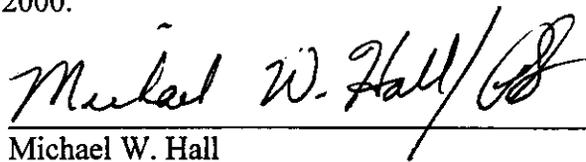
MMA/USPS-T33-FU-1 Please refer to your response to MMA/USPS-T33-5 (d). In that response you note that while you are mindful of the Commission's statement that "letters processed with automation incur minimal or possibly no extra costs for letters weighing up to three ounces", your conclusions about additional ounce costs were guided by USPS witness Daniel's weight study.

- (a) In your opinion, does the Daniel weight study refute the Commission's statement with respect to First-Class nonpresorted letters? Please explain your answer and provide or reference all documents you relied upon to formulate that answer and explanation.
- (b) In your opinion, does the Daniel weight study refute the Commission's statement with respect to First-Class presorted letters? Please explain your answer and provide or reference all documents you relied upon to formulate that answer and explanation.
- (c) In your opinion, does the Daniel weight study refute the Commission's statement with respect to Standard Mail (A) regular letters? Please explain your answer and provide or reference all documents you relied upon to formulate that answer and explanation.
- (a)

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 3rd day of March, 2000.


Michael W. Hall