

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

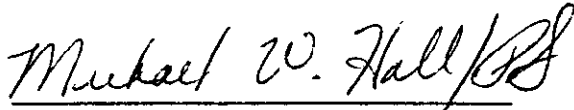
**MAJOR MAILERS ASSOCIATION'S FIRST SET OF
FOLLOW-UP INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS
TO USPS WITNESS LINDA KINGSLEY**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following follow-up interrogatories and document production requests to United States Postal Service witness Linda Kingsley: **MMA/USPS-T10-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
34693 Bloomfield Road
Round Hill, Virginia 20141
540-554-8880
Counsel for
Major Mailers Association

Dated: Round Hill, VA
March 7, 2000

**Major Mailers Association's First Set Of
Follow-Up Interrogatories And Document Production Requests
To USPS Witness Linda Kingsley**

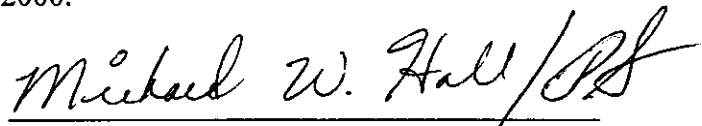
MMA/USPS-T10-FU-1 Please refer to your answer to MMA/USPS-T10-1. In that response you provide the volume of prebarcoded letters that were mailed in AP13 of FY 99.

- (a) What are the corresponding outgoing letter volumes separately for First-Class nonpresorted, presorted and Standard Mail (A) for that same time period?
- (b) Please identify the source(s) of your data and provide all copies of, or references to, such source documents.
- (c) In your opinion, is AP 13 of FY 99 representative of a full year? Please explain your answer and provide any studies or other documents you reviewed in formulating your answer to this question.
- (d) What is the volume of outgoing prebarcoded letters sent at First-Class nonpresorted rates (excluding QBRM) for the base year in this case?
- (e) What is the volume of prebarcoded reply envelopes mailed out at (1) nonpresorted rates, (2) presorted rates, and (3) nonpresorted and presorted rates combined?

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 7th day of March, 2000.


Michael W. Hall

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