

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

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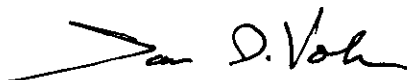
**POSTAL RATE AND FEE CHANGES, 2000**

**Docket No. R2000-1**

**INTERROGATORIES OF  
PITNEY BOWES TO USPS WITNESS FRONK  
(PB/USPS-T-33-3-5)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatory to USPS witness Fronk: PB/USPS-T-33-3-5. 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 Association for Postal Commerce

**PB/USPS-T33-3.** Please refer to your response to MMA/USPS-T33-1 and the Postal Service's response to PB/USPS-T11-1 (redirected from witness Meehan). According to your response to MMA/USPS-T33-1, in FY 1998 and FY 1999 the percentage of Nonpresort (Letters, Flats & Parcels) that is Metered Letters was 34.99 and 34.07, respectively. According to PB/USPS-T11-1, the percentage of single piece First-Class Mail that was metered in FY 1998 and FY 1999 was 48.84 and 49.39 percent, respectively.


- (a) Please reconcile the above percentages.
- (b) The RPW Report (Revised) for GFY 1998 shows 53,781,254,000 single piece Letters, Flats and IPPS. Please provide both the number and percentage that were (i) metered, (ii) stamped, (iii) permit and (iv) other (specify) and indicate the source used to derive the percentages.
- (c) The RPW Report (Revised) for GFY 1998 shows 2,944,565,000 Single-Piece cards. Please provide both the number and percentage that were (i) metered, (ii) stamped, (iii) permit and (iv) other (specify) and indicate the source used to derive the percentages.

**PB/USPS-T33-4.** For Fiscal Year 1998 please provide all non-postage revenue that the Postal Service derived from its meter program, including but not limited to (i) check-in check-out fees, (ii) meter reset fees, (iii) interest income on advance deposits for CMRS accounts, and (iv) other (please specify).

**PB/USPS-T33-5.** For Fiscal Year 1998 please provide all Postal Service expenses incurred on account of its meter program, including but not limited to (i) the cost of check-in check-out, (ii) the cost of meter reset fees, (iii) any costs chargeable to the interest on advance deposits for CMRS accounts, and (iv) other (please specify).

## CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

  
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Ian D. Volner