

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

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POSTAL RATE AND FEE CHANGES, 2000

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

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS ROBINSON**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Robinson: DMA/USPS-T34, No. 2. 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 the Direct Marketing
Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Dana T. Ackerly II

Dated: March 23, 2000

DMA/USPS-T34-2. Please refer to the Domestic Mail Rate History (LR-I-118) and your response to DMA/USPS-T34-1.

- a. Please confirm that the Postal Service offers presort discounts for First-Class Mail, Periodicals mail, Standard (A) Mail, and some Standard (B) Mail subclasses.
- b. Please confirm that the Postal Service offers presort discounts because mailer presortation reduces USPS costs.
- c. Please confirm that the Postal Service offers automation discounts for First-Class Mail, Periodicals Mail, Standard (A) Mail, and Standard (B) Mail.
- d. Please confirm that the Postal Service offers automation discounts because mailer prebarcoding reduces USPS costs.
- e. Please confirm that the Postal Service offers dropship discounts for First-Class Mail, Periodicals Mail, Standard (A) Mail, and Standard (B) Mail.
- f. Please confirm that the Postal Service offers dropship discounts because mailer dropshipping reduces USPS costs.
- g. Please confirm that the Postal Service's rate schedule for Standard (B) mail, Periodicals Mail, and Priority Mail that weighs more than five pounds is zoned.
- h. Please confirm that the Postal Service's rate schedule is zoned for these mail classes, which are comprised primarily of heavier pieces, because, *ceteris parabis*, pieces traveling longer distances in USPS transportation incur more USPS transportation costs than pieces traveling shorter distances in USPS transportation.
- i. Please confirm that mailer presortation, prebarcoding, and dropshipping of Priority Mail reduce USPS costs. If not confirmed, please explain your reasoning.
- j. Please confirm that Priority Mail pieces that travel long distances in USPS transportation incur more USPS transportation costs than Priority Mail pieces that travel only short distances in USPS transportation.