

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C.

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

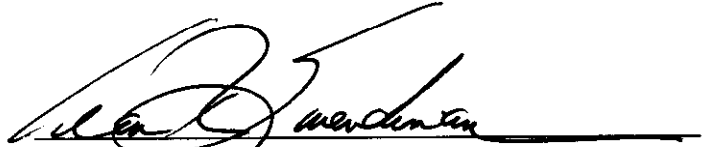
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

THIRD INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS FROM GREETING CARD ASSOCIATION TO
UNITED STATES POSTAL SERVICE WITNESS MAYES
(GCA/USPS-T32-13 THROUGH 16)
(MARCH 23, 2000)

Pursuant to Section 20 of the Commission's Rules of Practice, Greeting Card Association ("GCA") hereby serves the following interrogatories and request for production of documents directed to United States Postal Service witness Mayes: GCA/USPS-T32-13 through 16. GCA incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (January 24, 2000).

Respectfully submitted,



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THIRD GCA INTERROGATORIES TO
USPS WITNESS MAYES (USPS-T-32)

GCA/USPS-T-32-13. Please refer to your response to GCA/USPS-T32-2(a)(ii). Does your statement that you cannot answer this part without knowing the content of the letters referred to or the "particular value of such a transmission to the individual recipient" mean that you did not give consideration to which components of §3622(b)(8) apply to non-business or personal-correspondence letters? Please explain any negative answer.

GCA/USPS-T-32-14. Please refer to your response to GCA/USPS-T32-3(b). Does your reference there to your answer to subpart (a) mean that any Postal Service consideration of *cultural* value of First-Class letters to the recipient is fully described in chapter IV of the Household Diary Study? If not, please describe any other consideration given to that factor and state the conclusions reached.

GCA/USPS-T-32-15. Please refer to your response to GCA/USPS-T32-3(c).

- a. In developing your proposed cost coverage for First-Class letters, did you regard business correspondence by First-Class mail as identical or substantially identical with bulk (workshared) First-Class letters, and personal (non-transactional) correspondence by First-Class mail as identical or substantially identical with single-piece First-Class letters? If not, please explain what distinction(s) you recognized and how, if at all, they influenced your conclusions.
- b. Please identify the "rate or inflation" to which you refer in the last sentence of your response.
- c. In applying the ECSI criterion in the process of developing price level recommendations for the classes of mail in general, did you use the relationship between your proposed increase and the above-cited rate of inflation as a uniformity-applicable standard? If not, please explain why.

GCA/USPS-T-32-16. Please refer to your response to GCA/USPS-T32-9.

- a. In referring to "fairness and equity," "impact of rate increases on mailers," and "availability of alternatives," are you referring specifically to the requirements of 39 U.S.C. § 3622(b)(1), (4), and (5), respectively? If your answer is not an unqualified "yes," please explain what different or additional meaning you attach to the phrase(s) concerned.

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- b. Do you believe that prices determined in material part by Ramsey pricing principles would be consistent with recognition of the unavailability of alternatives for mail matter subject to the Private Express Statutes? Please explain the reasons for an affirmative answer to this part.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Alan R. Swendiman
Alan R. Swendiman *by AEF/s*