

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, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MAJOR MAILERS ASSOCIATION WITNESS HARRISON
(USPS/MMA-T2-1-5)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MMA witness Harrison: USPS/MMA-T2-1-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:


Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

CERTIFICATE OF SERVICE

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



Michael T. Tidwell

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June 7, 2000

USPS/MMA-T2-1.

- (a) Please list and explain all reasons why a bulk First-Class Mail user (one with sufficient volume to qualify its mail for any one of the various First-Class Mail worksharing discounts), in the absence of a rate incentive or a Postal Service requirement, would ensure that its mailing lists contained accurate, up-to-date addresses.
- (b) Please describe all reasons why a bulk First-Class Mail user (one with sufficient volume to qualify its mail for any one of the various First-Class Mail worksharing discounts), in the absence of a rate incentive or a Postal Service requirement, would ensure that mail pieces generated from such mailing lists had addresses which met USPS machine-readability standards and barcodes which met USPS specifications.

USPS/MMAT2-2.

Please refer to page 3 of your testimony. Please describe and quantify the difference in cost between (a) production of an outgoing bulk standard size one-ounce First-Class Mail letter piece which SBC, Pacific Bell, or a typical MMA member would produce in the absence of any mail piece design requirements currently imposed by the Postal Service and (b) production of an outgoing bulk standard letter-size one-ounce First-Class Mail piece which SBC produces to conform to current mail piece design requirements imposed by the Postal Service. In detail, please list every mail piece design characteristic and production activity SBC would not incorporate if it were not required by the Postal Service. Please estimate the costs associated with meeting each requirement and provide all documentation in support of those estimates.

USPS/MMA-T2-3.

Does SBC, Pacific Bell, or any member of MMA maintain any studies, data, market research, or other information concerning any benefit to SBC or MMA members which result from their provision of courtesy reply envelopes to their customers for the return of remittances? If so, please provide copies of all records, documents, data, correspondence, reports, studies or research which discuss such benefits. If no such documents exist, please describe all benefits to SBC, Pacific Bell, and MMA members which result from their provision of such courtesy reply envelopes.

USPS/MMA/T2-4.

Please refer to page 3, lines 16-19 of your testimony. Please describe in detail each activity which is a part of the coordination between SBC's Marketing and Remittance functions, paper and envelope providers and USPS Mail Design Analysts.

USPS/MMA-T2-5

At page 6, lines 24-26 of your testimony, you state that "ACT tagging is . . . used by many mailers for airmail. This eliminates the need for USPS to perform further scanning on airmail and can . . . expedite mail through the USPS processes. Despite the additional costs that mailers incur in meeting these requirements [such as labeling of pallets and ACT tagging] are not offset by lower postal rates."

- (a) On a unit basis, please quantify the cost to mailers of each of the activities described at lines 18-26 and the impact such activity has on postal mail processing costs.**
- (b) Is it your testimony that the impact of such activities on mail processing costs is not reflected in the Postal Service's estimates of First-Class Mail processing costs?**