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BEFORE THE POSTAL RATE COMMISSION JUN 28 4 28 PM '00 WASHINGTON, D.C. 20268-0001 POSTAL RATE COMMISSION

POSTAL BATT CORF (151)H OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000 Docket No. R2000–1 Docket No. R2000-1

UNITED STATES POSTAL SERVICE FOLLOW-UP INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO MAJOR MAILERS ASSOCIATION WITNESS BENTLEY (USPS/MMA-T1---20)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatory and request for production of documents to MMA witness Bentley: USPS/MMA-T1-20.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Ťidwell

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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 June 28, 2000

USPS/MMA-T1-20

In your response to USPS/MMA-T1-5(b), you discuss the additional costs that you say mailers incur in meeting requirements such as ACT tagging that you do not believe are included in workshare cost savings.

- a. Please confirm that mailers who affix ACT tags to containers of First-Class Mail they have prepared are often allowed to enter that mail at a postal facility later in the evening than if the mail required the Postal Service to perform the scanning prior to dispatch for air transportation. If you do not confirm, please explain. If you do confirm, indicate whether later entry times give mailers more time to prepare their mailing for entry into the postal system. Also indicate whether mailer ACT tagging contributes to some mail being dispatched by the Postal Service to available air on the evening the mail is entered instead of the next day.
- b. Please confirm that mailers are often willing to perform the following activities which are not required by the Postal Service in order to improve the processing and delivery of their mail. Alternatively, if you are unable to confirm, please explain and indicate which of the following activities are required by the Postal Service and result in no advantage to the mailer:
 - 1. Instead of bedloading or sacking, mailers will palletize mail to better facilitate its movement through their own facilities as well as postal facilities.
 - 2. To ensure that pieces within a mailing remain in good condition and to maintain a stable load during transport, mailers will palletize and stretch wrap trays and other containers of mail.
 - 3. To ensure proper handling for the best service within the mailer's facility and the postal network, mailers will label a container of mail to identify its contents.