

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

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POSTAL RATE AND FEE CHANGES

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

**Major Mailers Association's First Set Of Interrogatories And Document
Production Requests To USPS Witness Linda A. Kingsley**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to United States Postal Service witness Linda A. Kingsley:

MMA/USPS-T39-1-7. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

Major Mailers Association

By: 

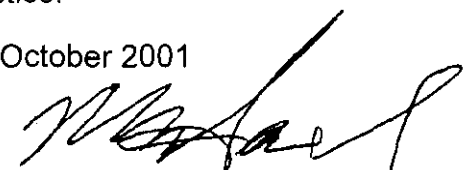
Michael W. Hall
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Round Hill, Virginia 20141
540-554-8880
Counsel for
Major Mailers Association

Dated: Round Hill, VA
October 26, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 26th day of October 2001


Michael W. Hall

**Major Mailers Association's First Set Of Interrogatories And Document
Production Requests For USPS Witness Linda A. Kingsley**

MMA/USPS-T39-1 Please refer to your Direct Testimony on page 6 where you describe the Delivery Bar Code Sorter.

- A. When letters are sorted to delivery point sequence, are First-Class and Standard Mail letters usually combined in this operation?
- B. Please confirm that the average weight of a First-Class Automation letter is .58 ounces and the average weight of a Standard Mail letter is .77 ounces. If you cannot confirm, please explain why not.
- C. Please indicate how the average weight difference between lighter First-Class letters and heavier Standard Mail letters impacts the cost of the delivery point sequencing operation. In other words, is there any cost difference between processing a First-Class letter vs. a Standard letter that can be tied to the significant difference in the average weight of such letters?

MMA/USPS-T39-2 A. What is the purpose for the letters "AUM3", "AUM5" or "AUMP" plus a zip code that can be found printed to the left of the barcode on some First-Class automated letters.

- B. At what point in the overall processing operation is this coding applied to First-Class letters and what equipment is used to apply such coding?

MMA/USPS-T39-3 How does the Postal Service categorize the following costs (either First-Class volume variable or institutional) associated with the RBCS?

- A. Hardware costs;
- B. Software costs;
- C. Maintenance costs;
- D. Space costs; and
- E. Labor costs.

MMA/USPS-T39-4 Please refer to Attachment A where this is a reproduction of an actual letter that was received. Note that the postage paid was 28 cents, the current automation basic rate, and that an ID Tag has been printed on the backside of the envelope.

- A. Please confirm that the postage paid is the automation basic rate. If you cannot confirm, please explain.
- B. Please confirm that the barcode shown on this envelope was sprayed on by the Postal Service. If you cannot confirm, please explain.

- C. Please confirm that the ID Tag on the back of the envelope was sprayed on by the Postal Service. If you cannot confirm, please explain.
- D. Please explain the line printed just below the return address that apparently says "SINGLE PIECE##10/11/01/KCMO/641".
- E. Please explain why this mail qualified for the automation basic rate?
- F. Please confirm that this letter was sent through the RBCS system. If you cannot confirm, please explain. If you can confirm, please explain why this letter was sent through the RBCS system.
- G. How much automation mail is sent through the RBCS system?
- H. Would the cost of processing this letter in the RBCS operation be attributed to First-Class single piece or First-Class automation? Please explain your answer.

MMA/USPS-T39-5 Please refer to page 26 of your Direct Testimony where you describe allied operations.

- A. Are the costs for these operations considered volume variable costs? If no, please explain your answer.
- B. Please consider mailing "A" of one million basic automation letters and mailing "B" of one million 5-digit automation letters. Do you agree that all other things equal, the mailing "A" would incur more platform and allied labor costs for the letters to reach its final destination than for mailing "B"? (Please also refer to USPS witness Miller's answer to MMA/USPS-T22-2F prior to answering this question.) If no, please explain your answer.

MMA/USPS-T39-6 Please describe what happens when mail is re-wrapped and the reasons why mail might be required to be re-wrapped.

MMA/USPS-T39-7 Please refer to your testimony on page 11 where you discuss the amount of letters that are currently sorted to DPS.

- A. What percent of total First-Class single piece letters will be sorted to carrier sequence by automation in the test year?
- B. What percent of First-Class presorted letters will be sorted to carrier sequence by automation in the test year?
- C. What percent of First-Class metered letters will be sorted to carrier sequence by automation in the test year?
- D. What percent of First-Class Automation letters will be sorted to carrier sequence by automation in the test year?

Dunbrooke

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Independence, MO 64055-0900
CANCELL HERE



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VIENNA, VA 22182

Unit Number	O.C.N. Number	Invoice Number
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POSTAGE WILL BE PAID BY ADDRESSEE