

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

Docket No. R2001-1

**Major Mailers Association's First Set Of Interrogatories And Document
Production Requests To USPS Witness John T. Pickett (Errata)**

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 John T. Pickett: **MMA/USPS-T17-1**. 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: 

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Counsel for
Major Mailers Association

Dated: Round Hill, VA
October 27, 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 27th day of October 2001.


Michael W. Hall

**Major Mailers Association's First Set Of Interrogatories And Document
Production Requests For USPS Witness John T. Pickett**

MMA/USPS-T17-1 As part of their worksharing efforts, mailers who mail sufficient First-Class volumes are required to presort postal trucks with pallets that are destined to the same destination office. Often, such trucks bypass the originating postal facility and are sent directly to a HASP or an airport.

- A. Are you familiar with this aspect of worksharing? Please explain.
- B. Please explain in detail how such a practice by workshare mailers saves money for the Postal Service.
- C. Please provide all studies and other documents that discuss and/or quantify the savings to the USPS of this worksharing practice.