

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

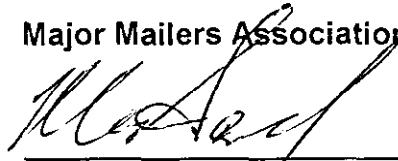
**Major Mailers Association's First Set Of
Interrogatories To The United States Postal Service**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories to the United States Postal Service: **MMA/USPS-1.**

Respectfully submitted,

Major Mailers Association

By:



Michael W. Hall
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540-554-8880

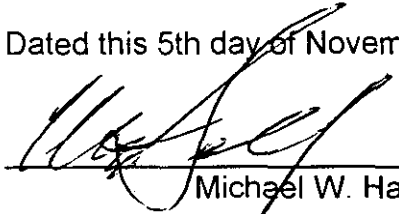
Counsel for
Major Mailers Association

Dated: Round Hill, VA
November 5, 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 5th day of November 2001.



Michael W. Hall

**Major Mailers Association's First Set Of Interrogatories
To The United States Postal Service**

MMA/USPS-1 Please refer to the USPS institutional response to Interrogatory MMA/USPS-T22-7, Part E which describes why the cost pools for "MODS99, 1SUPP_F1" and "MODS, 1SUPP_F4" are not applicable or relevant.

- A. Please explain why in this proceeding the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in for 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48_ADM" are provided in 1supp4, and are treated differently from the way the Commission treated them in Docket No. R2000-1, where you have confirmed the costs in part D to the original interrogatory.
- B. Please explain why the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in for 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48_ADM" are provided in 1supp4, as shown on page 8 of Library Reference USPS-LR-J-84, but are not reported as such on page 8 of Library Reference USPS-LR-J-60.
- C. Please confirm that USPS witness Miller's proposed cost savings would increase by approximately 16% to 18% for each First-Class Automation rate category, if the Commission assumes that labor costs vary 100% with volume, as it has done for 30 years. If you cannot confirm, please explain.