

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

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POSTAL RATE AND FEE CHANGES

POSTAL RATE COMMISSION  
Docket No. R2001-14

**Major Mailers Association's First Set Of Interrogatories And Document  
Production Requests To USPS Witness George S. Tolley**

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 USPS witness George S. Tolley: **MMA/USPS-T7-1-3**. 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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540-554-8880

Counsel for  
**Major Mailers Association**

**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.

  
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Michael W. Hall

**Major Mailers Association's First Set Of Interrogatories And Document  
Production Requests For USPS Witness George S. Tolley**

**MMA/USPS-T7-1** Please refer to pages 31-57 of your Direct Testimony where you discuss factors that affect First-Class volumes, particularly the shifting within First-Class of single piece letters to workshare letters over the past five years.

- A. In evaluating this shift for letters, please describe those letters as they existed within First-Class single piece, prior to shifting to the worksharing category, assuming that the letters were later to be prepared by a presort bureau.
- B. In evaluating this shift for letters, please describe those letters as they existed within First-Class single piece, prior to shifting to the worksharing category, assuming that the letters were later to be prepared in-house by the mailer.
- C. Please quantify approximately which portion of these letters shifted because they were to be prepared by a presort bureau versus the letters prepared by an in-house by the mailer.

**MMA/USPS-T7-2** Please refer to Table 1 on page 5 of your Direct Testimony.

- A. Please confirm that between the base year and test year (before rates) you show that First-Class single piece letters will decline by about 3.5 billion pieces. If you cannot confirm, please explain.
- B. Please confirm that between the base year and test year (before rates) you show that First-Class workshare letters will increase by about 5.0 billion pieces. If you cannot confirm, please explain.
- C. Please estimate how many of the 5.0 billion piece increase in workshare letters originate from the single piece category but will shift to the workshare category. Please explain your answer.

**MMA/USPS-T7-3** Please describe the pieces, as they existed within First-Class single piece, prior to shifting to the worksharing category between the base and test years.