

DOCKET SECTION

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

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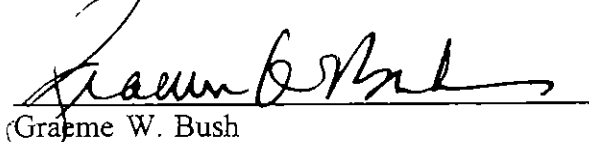
Postal Rate and Fee Changes, 1997)

Jul 31 4 33 AM '97
Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL TO USPS WITNESS MOELLER

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Mail Advertising Service Association International hereby submits the attached interrogatories to USPS witness Moeller: MASA/USPS-T36, Nos. 1-3. If the designated witness is unable to respond to any interrogatory, please supply a response by another qualified witness.

Respectfully submitted,

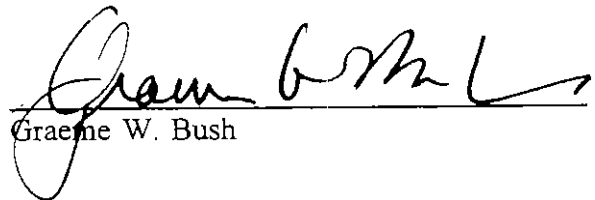


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Graeme W. Bush

Dated: July 30, 1997

WITNESS MOELLER (USPS-T36)

MASA/USPS-T36-1. At page 18 of your testimony, you state:

The new costing methodology and other changes to the cost models for automation letters lead to significant reductions in the calculated value of automation compatibility.

- a. Explain what you mean by "reductions in the calculated value of automation compatibility."
- b. Explain what "calculated value" means and describe how it is computed.
- c. When you speak of "value," value to whom?
- d. Is there another measure of the value of automation compatibility than what you have referred to as "calculated value?" If your answer is yes, describe that measure and explain whether and how the value of automation compatibility has decreased by any alternative measure.
- e. What "other changes to the cost models" are you referring to in your testimony? Explain and quantify how have they affected the value of automation compatibility.

f. In your opinion, would the value of automation compatibility have decreased under the costing methodology used in MC95-1? If your answer is yes, describe why you believe this and estimate the amount of the decrease.

MASA/USPS-T36-2. At page 28 of your testimony, you refer to the "Postal Service's concern regarding its letter automation program," and to proposed Basic Carrier Route rates that "would encourage letter mailings with this density to be entered at" automation rates. Does not this testimony suggest that the Postal Service places a high value on mail that is presented in automation compatible form? Explain any "no" answer.

MASA/USPS-T36-3. What automation rates would have been proposed if there were a separate automation subclass? If you cannot give precise rates in response to this question, describe what the impact would have been on proposed rates, quantifying as best as possible that impact.