

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

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Postal Rate and Fee Changes, 1997 )

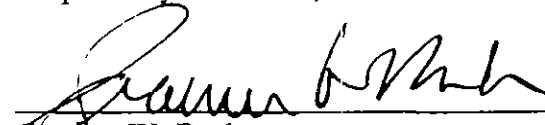
Docket No. R97-1 31 4 00 AM '97

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

INTERROGATORIES OF  
MAIL ADVERTISING SERVICE ASSOCIATION  
INTERNATIONAL TO USPS WITNESS DANIEL

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 Daniel: MASA/USPS-T29, Nos. 1-2. If the designated witness is unable to respond to any interrogatory, please supply a response by another qualified witness.

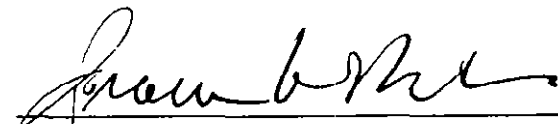
Respectfully submitted,

  
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Counsel for Mail Advertising Service  
Association International

**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.

  
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Graeme W. Bush

Dated: July 30, 1997

**WITNESS DANIEL (USPS-T29)**

MASA/USPS-T29-1.

a. Confirm that the following chart accurately sets forth the Mail Processing and Delivery unit costs in cents for the categories of Standard (A) mail indicated as computed by the Postal Service in this case and as determined by the PRC in MC95-1, and the differences between the two.

	R97-1 Mail Proc. & Delivery Unit Costs (Cents)	MC95-1 Mail Proc & Delivery Unit Costs (Cents)	Increase (Decrease)
<b>REGULAR SUBCLASS</b>			
<b>Nonletters:</b>			
Basic Presort	26.1585	30.4483	(4.2898)
Basic Automation	20.4392	27.5307	(7.0915)
3/5-Digit Presort	18.2192	21.0077	(2.7885)
3/5-Digit Automation	14.8855	17.4013	(2.5158)
<b>Letters:</b>			
Basic Presort	12.8452	16.8287	(3.9835)
Basic Automation	8.7366	9.5512	(0.8146)
3/5-Digit Presort	10.5299	12.1486	(1.6187)
3-Digit Automation	8.1455	8.7652	(0.6197)
5-Digit Automation	6.7847	6.7437	0.041
<b>ENHANCED CARRIER ROUTE SUBCLASS</b>			
<b>Nonletters:</b>			
Basic	10.3844	7.4263	2.9581
High Density	7.5692	6.6323	0.9369
Saturation	5.9082	5.0433	0.8649
<b>Letters:</b>			
Basic	6.8745	6.0700	0.8045
Auto Basic	6.2687	5.6500	0.6187

High Density	4.7640	5.2880	(0.524)
Saturation	3.8560	4.4170	(0.561)

b. Identify how much of each cost differential in the Regular Subclass is attributable to the use in this case of a new costing methodology resulting in the attribution of a lower proportion of mail processing and delivery unit costs compared to MC95-1.

c. Identify any other factors that have contributed to the reduction in mail processing and delivery unit costs in the Regular Subclass, and, for each factor, quantify the amount of the cost differential attributable to that factor.

d. Confirm that, with the exception of the High Density and Saturation categories, in the ECR Subclass mail processing and delivery unit costs have increased compared to MC95-1.

e. Explain why, in general, mail processing and delivery unit costs have increased for the ECR Subclass and decreased for the Regular Subclass compared to MC95-1.

MASA/USPS-T29-2. For each of the categories of Standard mail set forth on the chart in interrogatory MASA/USPS-T29-1, set forth the mail processing and delivery unit costs for each category under the costing methodology used in MC95-1.