

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

DOCKET SECTION

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Postal Rate and Fee Changes, 1997)

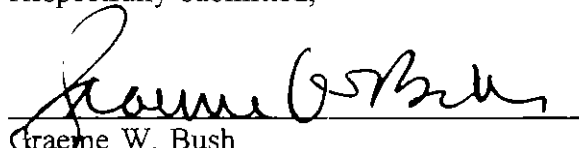
Docket No. R9711 2:30 PM '97

INTERROGATORIES OF
MAIL ADVERTISING SERVICE ASSOCIATION
INTERNATIONAL TO USPS WITNESS O'HARA

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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 O'Hara: MASA/USPS-T30, Nos. 1-3. If the designated witness is unable to respond to any interrogatory, please supply a response by another qualified witness.

Respectfully submitted,

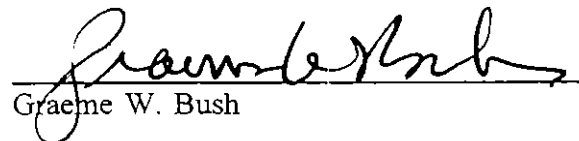


Graeme W. Bush
CAPLIN & DRYSDALE, CHARTERED
One Thomas Circle, N.W.
Suite 1100
Washington, DC 20005
(202) 862-5060

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.



Graeme W. Bush

Dated: July 31, 1997

WITNESS O'HARA (USPS-T30)

MASA/USPS-T30-1. Identify the implicit after rates markups, and cost coverages, for each of the categories of Standard mail in the table below:

REGULAR SUBCLASS	Mark-Up	Implicit Cost Coverage
Nonletters:		
Basic Presort		
Basic Automation		
3/5-Digit Presort		
3/5-Digit Automation		
Letters:		
Basic Presort		
Basic Automation		
3/5-Digit Presort		
3-Digit Automation		
5-Digit Automation		
ENHANCED CARRIER ROUTE SUBCLASS		
Nonletters:		
Basic		
High Density		
Saturation		
Letters:		
Basic		
Auto Basic		
High Density		
Saturation		

MASA/USPS-T30-2.

a. Please confirm that in MC95-1, the PRC estimated TY after rates volumes for Standard (A) Regular Automation letters as reflected on the following table (PRC Opinion and Recommended Decision, MC95-1, Appendix I, p. 2).

b. Please complete the table, noting your source for the data.

<i>Standard A Automation Categories (Letters)</i>	<i>MC95-1 PRC TY Volume Estimates (After-Rates)</i>	<i>Actual Volumes Year Ended June 30, 1997¹</i>	<i>R97-1 TY Volumes (Before Rates)</i>	<i>R97-1 TY Volumes (After Rates)</i>
Basic	4,430,828			
3-Digit	3,585,542			
5-Digit	6,276,280			

Table cont'd.

<i>1997PFY (Before-Rates)</i>	<i>1997PFY (After-Rates)</i>	<i>1998PFY (Before-Rates)</i>	<i>1998PFY (After-Rates)</i>	<i>1999PFY (Before-Rates)</i>	<i>1999PFY (After-Rates)</i>

MASA/USPS-T30-3.

a. Identify the factors to which you attribute any volume shifts that have occurred between (a) the 5-Digit and 3-Digit categories and (b) the 3-Digit and Basic categories for Standard automation letter mail.

b. Identify the factors to which you attribute any volume shifts that are projected to occur between (a) the 5-Digit and 3-Digit categories and (b) the 3-Digit and Basic categories for Standard automation letter mail.

c. Identify and discuss the policy, operational or other reasons (if any) for encouraging a shift of mail volume out of 5-Digit toward less finely pre-sorted mail in the automation letter class?

¹ If you are unable to give actual volumes for this period, please give actual volumes for the longest period for which you have the data, and supplement the response with the requested period data when it becomes available.