

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

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

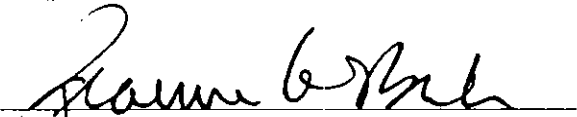
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SECOND 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. 4-5. If the designated witness is unable to respond to any interrogatory, please supply a response by another qualified witness.

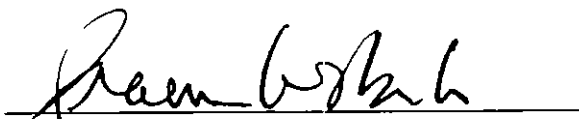
Respectfully submitted,


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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.


Graeme W. Bush

Dated: July 31, 1997

WITNESS MOELLER (USPS-T36)

MASA/USPS-T36-4.

- a. Confirm that the discount proposed for Standard mail entered at the destination SCF is for all rate categories .3 cents per piece. If you cannot confirm, explain why.
- b. Confirm that the discount currently offered for Standard mail entered at the destination SCF is .5 cents. If you cannot confirm, explain why.
- c. Describe for each rate category any volume effect the USPS has determined will result from the decrease of the discount increment between BMC and SCF destination entry mail to .3 cents.
- d. If the USPS has determined that there will be a volume decrease in SCF destination mail for any rate category, identify each policy, operational and other reason that justifies a volume shift away from the rate category with the higher level of worksharing.

MASA/USPS-T36-5. At page 20 of your testimony, you state that "savings due to destination entry, unlike most other worksharing discounts, have increased."

- a. Confirm that per unit discounts for SCF destination entry categories of letters and flats in Standard mail, Regular Subclass, have been decreased in the USPS proposal in this case compared to MC95-1. If you cannot confirm, please explain why not.
- b. Provide the data showing the per unit cost savings and discounts for BMC and SCF Standard Regular and ECR mail in MC95-1 and as determined by the Postal Service in this case.

c. In light of the increase in cost savings for destination entry categories of Standard mail referred to in your testimony, what is the justification for decreasing the SCF discount?