

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997)
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Docket No. R97-1

FIRST SET OF INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS
SHARON DANIEL (USPS-T-29)

Major Mailers Association asks the United States Postal Service to answer the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. In answering these interrogatories, the witness is requested to follow the General Instructions that are set forth in Attachment 1 to this document. Requests for data or documents are to be interpreted in accordance with General Instructions G and H. If the designated witness is unable to respond to any interrogatory, the Postal Service is asked to redirect the question to another Postal Service witness who can answer it.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION



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August 13, 1997

MMA INTERROGATORIES TO USPS WITNESS
(Sharon Daniel: Set One)

MMA/USPS-T29-1.

Please refer to USPS-29C, pages 1 and 2. Comparing First-Class Automated unit costs for mail processing and delivery versus Standard Mail Regular Automation costs (rounded):

- (A) Why is the Standard Mail Basic letter unit cost (8.7 cents) lower than for a First-Class Basic letter (9.0 cents)?
- (B) Why is the Standard Mail 3-Digit letter unit cost (8.15 cents) about the same as for a First-Class 3-Digit letter (8.2 cents)?
- (C) Why is the Standard Mail 5-Digit letter unit cost (6.8 cents) higher than for a First-Class 5-Digit letter (6.6 cents)?
- (D) Confirm the following unit costs and rates (in cents, rounded) shown below are proposed by the Postal Service in this proceeding.

<u>Mail Category</u>	<u>Unit Cost</u>	<u>Unit Rate (1 oz)</u>	<u>Unit Rate (2 oz)</u>
First Class:			
Basic	9.0	26.1	49.1
Automated 3-digit	8.2	25.4	48.4
Automated 5-digit	6.6	23.8	46.8
Standard A Regular:			
Basic Automation	8.7	18.9*	18.9*
Automated 3-digit	8.15	17.8*	17.8*
Automated 5-digit	6.8	16.0*	16.0*

*Assumes no destination entry discount

- (D) Confirm that the rates for Standard Mail Regular Automation are the same for all pieces that weigh up to 3 oz. If you cannot, please explain.

(E) Please confirm that the average First-Class presorted letter weighs .6 ounces whereas the average Standard Mail non-carrier route presorted letter weighs 2.3 ounces. (See USPS-T-5, pages 15 and 18.)

(F) What is the average weight of (1) a First-Class Automation letter and (2) a Standard Mail Regular Automation letter? If this information is not available, which weighs on average more, a First-Class Automation letter or a Standard Mail Regular Automation letter? Support your answer.

**End of Set One Interrogatories,
but please note attached
General Instructions For Answering)**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail,
upon the participants requesting such service in this proceeding



Jeffrey Plummer

August 13, 1997

GENERAL INSTRUCTIONS FOR ANSWERING INTERROGATORIES

A. If the witness to whom a particular Interrogatory or Request for Production of Documents is directed is unable to respond, the witness and his or her lawyers should redirect the question or request to another Postal Service witness who can answer the question or comply with the request. If the Postal Service believes that none of its witnesses can respond to an Interrogatory or Request, it is asked to advise MMA counsel of its position promptly by facsimile message to Telecopy Number 202-293-4377.

B. In interpreting the wording of an Interrogatory or Request for Production of Documents, please do not be hypertechnical or grudging. A witness is often able to ascertain what information is being sought even if the Interrogatory or Request is not worded precisely or correctly. Similarly, an Interrogatory or Request may seek information that is not available, but the witness will know about the availability of other, somewhat different information that the requesting party could use in lieu of the unavailable information. In such cases, the witness is asked to interpret the Interrogatory or Request generously, providing the information that the requesting party would have asked for if that party had phrased the inquiry more precisely or know about the available information.

C. If the Interrogatory or Request for Production of Documents requests information that the Postal Service has previously supplied in this proceeding, please state and identify

the document in which that information was provided. Identify any Library References and Workpapers that also contain information relevant to the Interrogatory or Request.

D. The witness should provide all workpapers that are relevant to the witness' response to an Interrogatory or Request for Production of Documents.

E. As used in an Interrogatory or Request for Production, the term "documents" includes, but is not limited to: letters, memoranda, reports, studies, testimonies, pamphlets, newspaper clippings, tabulations, drafts and workpapers by whatever means created, recorded, stored or transmitted, together with any written material necessary to understand or use such documents. The term "workpapers" includes all back-up material, whether prepared manually, mechanically or electronically, and should set forth the calculations of costs, prices, rates or statistical analyses created by or for the witness in preparing his testimony, together with explanatory information sufficient to permit replication of the arithmetic steps depicted in such workpapers.

F. In referring to a document, please cite the complete title, author, publisher and date of publication. References should cite page and line, if possible. Unless the document is testimony filed in this proceeding, please state the document's location and, if not published, the identity, location and telephone number of the document's custodian.

G. When a witness is asked to provide data or a document, the request should be interpreted as asking for information that

is available to the Postal Service and that the witness knows about or has the ability to locate without reasonable burden. In determining what information is "available" to the Postal Service, within the meaning of Section 25 of the Commission's Rules of Practice, the witness should follow the Presiding Officer's Ruling No. R94-1/18 (p. 6), that: "The available is that which it is possible to obtain." (See also Presiding Officer's Ruling No. R94-1/38, p. 5; legal authorities cited in MMA's May 10, 1994 Request for Leave to File Response and June 16, 1994 Response to Postal Service's Motion to Compel, both in Docket No. R94-1.) In the event that the requested party does not provide the information because the requested party believes that doing so would be an unreasonable burden, the requested party is expected to make the showing required under Rule 25(c) of the Commission's Rules of Practice and Procedure.

H. In the event that answering the request requires the Postal Service to compile information, to perform research or to make analyses, the Postal Service is requested to comply with the principles stated in Presiding Officer's Ruling No. R94-1/18 (pp. 5-6) and other Commission Orders in Docket No. R94-1 concerning MMA's discovery requests and motions to compel and the Postal Service's objections thereto. (See also Federal court decisions cited in MMA's June 16, 1994 Response to Postal Service's Motion to Compel.) In the event that the requested party does not provide the information because the requested party believes that doing so would be an unreasonable burden, the requested party is expected to make the showing required under Rule 25(c) of the Commission's Rules of Practice and Procedure.