

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

RECEIVED  
Aug 13 11 51 AM '97

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

\_\_\_\_\_  
POSTAL RATE AND FEE CHANGES, 1997 )  
\_\_\_\_\_ )

) Docket No. R97-1

FIRST SET OF INTERROGATORIES  
OF MAJOR MAILERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE WITNESS  
JOSEPH D. MOELLER (USPS-T-36)

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



Richard Littell  
1220 Nineteenth St. N.W.  
Suite 400  
Washington, DC 20036  
Phone: (202) 466-8260

August 13, 1997

**MMA INTERROGATORIES TO USPS WITNESS  
(Joseph D. Moeller: Set One)**

**MMA/USPS-T36-1.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) Regular Automation letters.

(A) Confirm that the Service's proposed Standard Automation rates would result in the following postage prices for letters:

<b>Standard(A) Regular Automation 5-Digit: Weight (No Entry Discount)</b>	<b>Rate (Cents)</b>
---	-------------------------

0.1 oz. to 1.0 oz.	16.0
1.1 oz. to 2.0 oz.	16.0
2.1 oz. to 3.0 oz.	16.0

(B) If you cannot confirm this, please state the correct postage prices for each of the listed letters.

**MMA/USPS-T36-2.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) Regular Automation letters.

(A) Confirm that the Service's proposed Standard Automation rates would result in the following postage prices for letters:

<b>Standard(A)Regular Automation 3-Digit: Weight (No Entry Discount)</b>	<b>Rate (Cents)</b>
--	-------------------------

0.1 oz. to 1.0 oz.	17.8
1.1 oz. to 2.0 oz.	17.8
2.1 oz. to 3.0 oz.	17.8

(B) If you cannot confirm this, please state the correct postage prices for each of the listed letters.

**MMA/USPS-T36-3.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) Regular Automation subclass.

(A) Confirm that the Service's proposed Standard Automation rates would result in the following postage prices for letters:

<b>Standard(A)Regular Automation Basic: Weight (No Entry Discount)</b>	<b>Rate (Cents)</b>
--	-------------------------

0.1 oz. to 1.0 oz.	18.9
1.1 oz. to 2.0 oz.	18.9
2.1 oz. to 3.0 oz.	18.9

(B) If you cannot confirm this, please state the correct postage prices for each of the listed letters.

**MMA/USPS-T36-4.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) Regular Presort letters.

(A) Confirm that the Service's proposed Standard Presort rates would result in the following postage prices for letters:

<b>Standard(A)Regular 3/5 Digit Presort: Weight (No Entry Discount)</b>	<b>Rate (Cents)</b>
---	-------------------------

0.1 oz. to 1.0 oz.	20.9
1.1 oz. to 2.0 oz.	20.9
2.1 oz. to 3.0 oz.	20.9

(B) If you cannot confirm this, please state the correct postage prices for each of the listed letters.

**MMA/USPS-T36-5.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) Regular Presort letters.

(A) Confirm that the Service's proposed Standard Presort rates would result in the following postage prices for letters:

<b>Standard(A)Regular Basic Presort: Weight (No Entry Discount)</b>	<b>Rate (Cents)</b>
---	-------------------------

0.1 oz. to 1.0 oz.	24.7
1.1 oz. to 2.0 oz.	24.7
2.1 oz. to 3.0 oz.	24.7

(B) If you cannot confirm this, please state the correct postage prices for each of the listed letters.

**MMA/USPS-T36-6.**

In your Testimony (USPS-T-36, page 21), you list the proposed rates for Standard (A) non-letters.

Please confirm that:

(A) For basic automation flats, the rates are the same for all pieces weighing up to 3.3 ounces. If not please explain.

(B) For 3/5 digit automation flats, the rates are the same for all pieces weighing up to 3.3 ounces. If not, please explain.

(C) For basic presorted non-letters, the rates are the same for all pieces weighing up to 3.3 ounces. If not, please explain.

(D) For 3/5 digit presorted non-letters, the rates are the same for all pieces weighing up to 3.3 ounces. If not, please explain.

**MMA/USPS-T36-7.**

(A) Please confirm that Standard Mail (A) letters are generally processed on the same barcode sorters as First-Class letters.

(B) If you cannot confirm, please explain the frequency of occurrences when Standard Mail (A) letters and First-Class letters are processed separately and the circumstances that dictate such separate processing.

(C) Are barcode sorters capable of processing Standard (A) letters and First-Class letters together without impairing throughput and productivity?

(D) Can barcode sorters detect the difference between First-Class letters and Standard (A) letters and, if so, how?

**MMA/USPS-T36-8**

In a document entitled "Revisions To Weight and Preparation Standards for Barcoded Letter Mail, published in 59 Federal Register 65967-71 (Dec. 22, 1994) and 60 Federal Register 5860-61 (January 31, 1995), the Postal Service announced: "For a period of up to 1 year, beginning January 16, 1995, the Postal Service will conduct a test of live barcoded bulk third-class regular rate letter mail weighing between 3.0 and 3.3071 ounces, and barcoded bulk third-class nonprofit rate, First-Class and second-class letter mail weighing between 3.0 and 3.376 ounces" (60 Fed. Reg. at 5860) in order "to determine whether a permanent increase in the maximum weight for barcoded letter mail is appropriate...." (59 Fed. Reg. at 65969).

- (A) In those tests, did the Postal Service test letters that weighed:
- (1) 2.9 ounces but not more than 3.0 ounces?
  - (2) 3.0 ounces but not more than 3.3 ounces (rounded)?
- (B) Did the tests show that the automation machinery experienced reduced throughputs for letters that weighed:
- (1) 2.9 ounces but not more than 3.0 ounces?
  - (2) 3.0 ounces but not more than 3.3 ounces (rounded)?
- (C) If the answer to Paragraph (B)(1) or (2) is other than no, please explain and state the weight of letters that reduced throughputs. Please state the degree of such reduction in throughputs for each type of letter by weight.

**MMA/USPS-T36-9.**

In USPS-T-36, page 16, you state that the Standard mail rate design incorporates a breakpoint weight--the maximum weight for pieces that pay only the per-piece rate--of 3.3 ounces. (See also *Id.* page 7, note 7.)

(A) Please explain whether the selection of this breakpoint takes into account the results of the "live" test announced in 59 Federal Register 65967-71 and 60 Federal Register 5860-61 and, if so, how.

(B) Please explain whether the "live" test announced in 59 Federal Register 65967-71 and 60 Federal Register 5860-61--which was to process "First-Class and second-class letter mail weighing between 3.0 and 3.376 ounces" (60 Fed. Reg. at 5860)--supports your use of a breakpoint rate of 3.3 ounces and, if so, how.



**MMA/USPS-T36-10.**

Please refer to Interrogatory MMA/USPS-T36-8 and 9 concerning the Postal Service's "live" test announced in 59 Federal Register 65967-71 and 60 Federal Register 5860-61. Those Federal Register Notices also published a final rule entitled "Revisions To Weight and Preparation Standards for Barcoded Letter Mail.

(A) How did the test results affect the rule published in 59 Federal Register 65967-71 and 60 Federal Register 5860-61 ?

(1) Was the rule continued in effect and, if so, does the rule remain in effect?

(2) Was the rule modified and, if so, how was it modified? Does the modified rule remain in effect?

(3) Was another rule adopted in place of the rule and, if so, what did the modified rule provide and does it remain in effect? If another rule was adopted, please provide a copy.

(B) With respect to automation-compatible barcoded letter-size mail, does the Postal Service currently allow Standard and First-Class Mail weighing 3.0 ounces to be accepted at Automation rates and, if so, what is the maximum allowable rate?

(C) With respect to automation-compatible barcoded letter-size mail, does the Postal Service currently allow Standard and First-Class Mail weighing 2.0 ounces or more to be accepted at Automation rates and, if so, what is the maximum allowable rate?

(D) In the live tests announced in 59 Federal Register 65967-71 and 60 Federal Register 5860-61, were the First-Class and the third-class letters processed on the same machines and, if so, were the First-Class and third-class letters processed together?

**MMA/USPS-T36-11.**

Please refer to Interrogatories MMA/USPS-T36-8 through 10.

(A) In the live tests announced in 59 Federal Register 65967-71 and 60 Federal Register 5860-61, on what types of Postal Service processing machines were the third-class and First-Class letters processed?

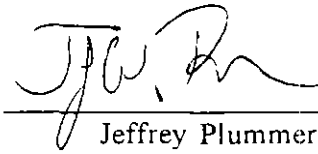
(B) What was the basis on which it was determined that the tests should be conducted on these types of machines?

**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.