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

Nov 19 3 15 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**Major Mailers Association's Second Set Of Interrogatories And Document
Production Requests To USPS Witness Linda A. Kingsley**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to United States Postal Service witness Linda A. Kingsley:

MMA/USPS-T39-8-9. If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

Major Mailers Association

By: 

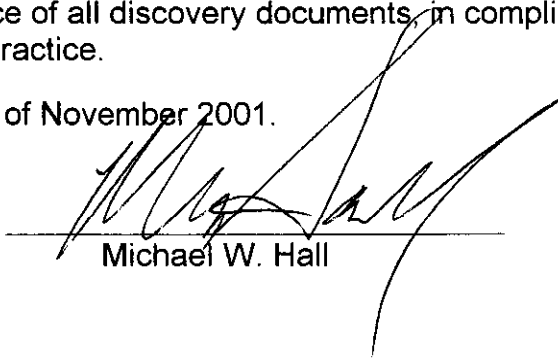
Michael W. Hall
34693 Bloomfield Road
Round Hill, Virginia 20141
540-554-8880
Counsel for
Major Mailers Association

Dated: Round Hill, VA
November 19, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 19th day of November 2001.


Michael W. Hall

world situation where heavy letters are interspersed among lighter weight letters. If you cannot confirm, please explain.

- I. Please confirm that in Docket MC95-1, MMA witness Bentley concluded in answer to Part c of Interrogatory USPS/MMA-T2-3 that "only .14% of First-Class letters weigh over 2 ounces," and that "USPS witness Smith readily admits" that the "impact of such a small amount of heavyweight volumes would hardly affect the costs."
- J. Please confirm that MMA witness Bentley reported, in response to Interrogatory Part d of USPS/MMA-T2-3 in Docket No. MC95-1, that "when heavyweight letters comprised one percent of and were intermixed with lightweight letters," the throughput decreased by just .6%. If you cannot confirm, please explain.

MMA/USPS-T39-9 Please refer to your response to Part A of Interrogatory MMA/USPS-T39-5 where we were asked if allied operations costs were considered volume variable. Your response claims that such costs do not vary 100% with volume.

- A. Is it your understanding that the Postal Service attributes such costs to specific subclasses? If no, please explain.
- B. Is it your understanding that allied operations costs are "covered" by each subclass to meet the requirement of Section 3623(B)(3) of the Act?