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

Nov 29 4 08 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

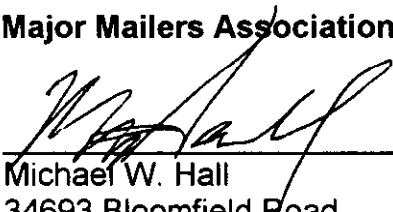
**Major Mailers Association's Fifth Set Of
Interrogatories To The United States Postal Service**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories to the United States Postal Service: **MMA/USPS-5-7.**

Respectfully submitted,

Major Mailers Association

By:



Michael W. Hall
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Round Hill, Virginia 20141
540-554-8880

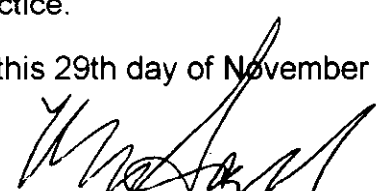
Counsel for
Major Mailers Association

Dated: Round Hill, VA
November 29, 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 29th day of November 2001.



Michael W. Hall

**Major Mailers Association's Fifth Set Of Interrogatories
To The United States Postal Service**

MMA/USPS-5 Please refer to your response to Part O of Interrogatory MMA/USPS-T22-33. You were asked if was reasonable to estimate the amount of bulk metered mail (BMM) that was undeliverable-as-addressed (UAA) by multiplying the percentage of UAA for all First-Class single piece letters by the percentage of single piece UAA mail that was sent from businesses. If your answer was "no", you were asked to explain why not. You answered no, because actual data for quantifying the percentage of BMM that was UAA was not available.

- A. Does the description above correctly state the original question and answer? If no, please explain.
- B. How does the fact that the Postal Service does not have the requested information make it unreasonable to estimate that data in the fashion suggested?
- C. Please confirm that the Postal Service has no way of estimating the amount of BMM letters that are UAA?

MMA/USPS-6 Please confirm that the Postal Service does not know the following information concerning bulk metered mail (BMM) for either the base year or test year in this case from any data collection sources or from a special, in-depth study.

- A. Total volume;
- B. Average weight;
- C. Whether or not BMM is accepted by a window clerk;
- D. Average number of pieces per mailing;
- E. Average number of trays per mailing;
- F. Average number of pieces per tray;
- G. Volume or percentage that is machinable;
- H. Volume or percentage that is automation-compatible;
- I. Volume or percentage that has handwritten addresses;

DD. Whether BMM is, in fact, the most likely type of mail that will shift from the single piece category to the workshare category; and

EE. What volume or portion of the letters that can be expected to shift from single piece to workshare between the base and test years that are BMM.

MMA/USPS-7 Please consider the following statements (1) the Postal Service uses bulk metered mail (BMM) as the benchmark to support rates that affect 50 billion pieces and will contribute over \$10 billion to institutional costs under its rate proposals in this case, and (2) workshare letters is the largest category of First-Class mail and, with the exception of workshare cards, is the most profitable.

A. Do you agree with those statements? If no, please restate them and explain why you made each change in the statements.

B. Please confirm that for purposes of measuring workshare cost savings in this case, the Postal Service attempted to estimate the following about BMM.

1. The average BMM mail processing costs that relate to mail processing worksharing by using CRA-derived costs for metered mail letters as a proxy;
2. The average BMM delivery cost by using the delivery cost of non-automation mixed AADC letters (in itself, an estimate) as a proxy;
3. The percentage of BMM letters that are delivery point sequenced, which is derived from a simulation model that *understated* the CRA-based BMM unit processing cost estimate by more than 50%.
4. The delivery characteristics of BMM letters, which the USPS assumed are more similar to presorted letters than to single piece letters, in terms of being addressed and delivered to a post office box.

C. Please provide all other information that you know about BMM or have estimated about BMM in this case, in addition to that listed in Part B.