

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

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**Major Mailers Association's First Set Of Follow Up Interrogatories And
Document Production Requests To USPS Witness Maura Robinson**

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 Maura Robinson:

MMA/USPS-T29-22. 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: /s/ Michael W. Hall

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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 21st day of December 2001.

/s/ Michael W. Hall
Michael W. Hall

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MMA/USPS-T29-22 Please refer to your response to Interrogatory MMA/USPS-T29-19 and your response to Part J of Interrogatory MMA/USPS-T29-16. You were asked to confirm, in the most recent interrogatory, that had you proposed an average 7.4% percent for First-Class workshare mail (excluding fees) using the PRC cost methodology, the resulting implicit cost coverage for that mail would be 262. You failed to confirm this because you do not have a volume forecast or a roll-forward associated with a 7.4% increase for this category since your proposed increased was 9.2%.

- A. Please confirm that by working with unit revenues and costs that was suggested to you in Interrogatory MMA/USPS-T29-19, you still could not confirm that the resulting implicit cost coverage for First-Class workshare letters would be 262 because that methodology results in an "estimate" of the cost coverage, rather than the "actual" cost coverage.
- B. Please confirm that had you proposed a 7.4% for workshare letters, notwithstanding that it "is vague and difficult" to translate such an increase "into specific rate elements", that the resulting cost coverage using the PRC cost methodology is "estimated" to be 262. If you cannot confirm, please provide your best "estimate".