

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

POSTAL RATE AND FEE CHANGES, 2001 : Docket No. R2001-1
:

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS MILLER
(MMA/USPS-T22-65)

The United States Postal Service hereby provides its response to the following interrogatory directed by Major Mailers Association to witness Miller (USPS-T-22) on December 10, 2001: MMA/USPS-T22-65.

The interrogatory has been redirected from witness Miller to the Postal Service for response.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 26, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 26, 2001

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MMA/USPS-T22-65

Does worksharing begin with the design of a mailpiece? Please explain your answer.

RESPONSE:

To the extent that a mailer executes a mail piece design element, the absence of which would have resulted in the incurrence of higher postal mail processing costs than result because of its presence, it could be said that the mailer, in the broadest sense, has engaged in a form of “worksharing.” This is irrespective of whether that particular form of “worksharing” presently merits a rate differential or is deemed to exceed the scope of “worksharing” activity for which postal rate differentials are designed.

Thus, for instance, mailers who elect to use automation-compatible envelopes that result in the avoidance of manual processing by the Postal Service could be said to be engaged in “worksharing.” The same could be said for mailers who address their mail pieces in a manner designed to result in avoidance of the least efficient methods of postal mail processing.