

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Customized Market Mail )  
Minor Classification Changes )

Docket No. MC2003-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS CHRISTOPHER C. ASHE  
(OCA/USPS-T1-22-27)  
March 27, 2003

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated March 21, 2003 are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPA-T1-22. At page 1 of your testimony, you state:

CMM would be Standard Mail, typically consisting of advertising matter, designed and produced in a unique and unusual shape, with other distinctive features of color or content, to serve as a high-impact marketing piece for the delivery of the sender's message.

- a. Given the Nonprofit advertising restrictions, how is the Postal Service going to ensure that a Nonprofit CMM Standard Mail piece meets each of the six eligibility requirements (known as the "Six-Step Process") stated in USPS Publication 417, "Nonprofit Standard Mail Eligibility"?
- b. Please explain fully how the USPS will ensure that a Nonprofit CMM Standard Mail piece meets all other requirements that must be considered when determining that a mail piece may be mailed, at the Nonprofit CMM Standard mail piece rate? "For example, see the cooperative mail rule and other requirements in 4-3[ ]" as referred to in USPS Publication 417, at page 25.
- c. Please explain fully where the determination of nonprofit eligibility will be made for a Nonprofit CMM Standard Mail piece; for example, the entry DDU.
- d. If one Nonprofit CMM Standard mailing is entered at multiple DDUs, will each DDU make its own determination that the CMM mail piece is eligible for nonprofit status?

OCA/USPS-T2-23. At page 2 of your testimony, you note that the requirement, among others, of a regular, rectangular shape for the typical letter or flat-size mail piece was established for "efficient handling and delivery of that mail." Please confirm that it is less efficient to handle and deliver a nonrectangular or irregular shape Standard Mail piece than a regular, rectangular shape Standard Mail piece. If you do not confirm, please explain why you do not.

OCA/USPS-T2-24. Have you or anyone in the Postal Service done any studies to determine the impact on the efficiency of handling and delivering mail that is nonrectangular or irregular shape Standard Mail as compared to regular, rectangular shape Standard Mail? If so, please provide those studies, documentation and workpapers.

OCA/USPS-T2-25. You say at page 7, lines 19-21, that the minimum volume requirement would apply to the entire plant-verified drop shipment program (PVDS) mailing rather than the quantity for each DDU. If a large shipment that in total met the minimum volume requirement but was not first verified at an upstream plant under the drop shipment (PVDS) program, and so was delivered to the DDU without prior verification, and if the volume at an individual DDU did not meet the minimum volume, would the mailer lose the opportunity to meet the minimum volume requirement and therefore not qualify for CMM at that DDU?

OCA/USPS-T2-26. Please refer to your testimony at page 11, line 15. Although you say there would not be a requirement for Postal Service design approval, physical or graphic content would be subject to existing standards and statutes. Have you or anyone else in the Postal Service undertaken any studies to determine the per piece and total cost of approving physical or graphic content of these low-volume targeted mailings? Is so, please provide the studies and related documentation.

OCA/USPS-T2-27. Please refer to your testimony at page 12, line 11. Have you or anyone else in the Postal Service undertaken any studies to determine the per piece savings and total cost savings arising from discarding undeliverable-as-addressed CMM? If so, please provide the studies and related documentation.