

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

RECEIVED
SEP 16 12 08 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

))
POSTAL RATE AND FEE CHANGES, 1997))

))

Docket No. R97-1

FIRST SET OF INSTITUTIONAL INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION
TO THE UNITED STATES POSTAL SERVICE

Major Mailers Association asks the United States Postal Service to answer the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. In answering these interrogatories, the Service is requested to follow the General Instructions that are set forth in Attachment 1 to prior interrogatories to its witnesses. Requests for data or documents are to be interpreted in accordance with General Instructions G and H. The Postal Service is asked to direct the question to any Postal Service official who can answer it.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION



Richard Littell
1220 Nineteenth St. N.W.
Suite 400
Washington, DC 20036
Phone: (202) 466-8260

September 16, 1997

**MMA INSTITUTIONAL INTERROGATORIES TO USPS
(Set One)**

MMA/USPS-INST-1

Please confirm that, as reported in the December 1995 article from the AMMA Bulletin 52-95 (attached hereto), Deputy Postmaster General Michael Coughlin told AMMA that the Postal Service was pleased with the results of tests it has been conducting with a group of AMMA-member companies involving pieces weighing up to 3.5 ounces. If you cannot confirm, please explain why and state the Postal Service's policy about the maximum permissible weight for automation-rated letters.

MMA/USPS-INST-2

Please confirm that, as reported in the December 1995 article from the AMMA Bulletin 52-95 (attached hereto), the Postal Service announced in late 1995 that it had approved AMMA's request to increase the maximum permissible weight for automation-rated letters above the then-present 3.0 ounces. If you cannot confirm, please explain why and state the Postal Service's policy about the maximum permissible weight for automation-rated letters.

MMA/USPS-INST-3

Has the Postal Service taken the steps necessarily to implement a higher weight limit for Standard Mail A automation letters on a permanent basis? If yes, please explain. If no, why not?

MMA/USPS-INST-4

Q) Please refer to your answer to MMA/USPS-T32-24 (B). There you indicate that the unit cost derived for First-Class Single Piece letters includes the cost pool for mail preparation and acceptance, including culling, facing and canceling stamped mail. Please state precisely in LR-H-106 where that cost pool is shown as being included for First-Class single piece letters.

MMA/USPS-INST-5

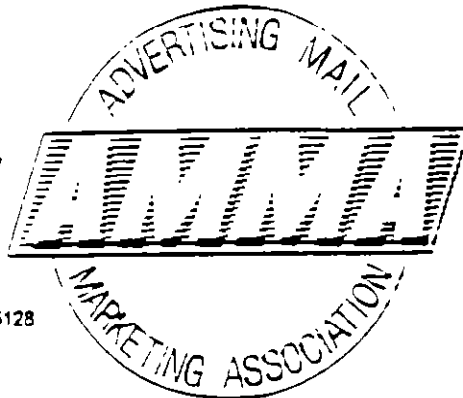
Q) Please refer to your answer to MMA/USPS-T32-25(D) and USPS witness Hatfield's answer to MMA/USPS-T25-3(E). If the Commission finds that labor processing costs are 100% variable with volume, do you agree that the difference between the unit costs for First-Class single piece letters and First-Class presorted letters will increase in similar fashion as the unit costs derived by USPS witness Hayfield in his cost models. If not, please explain.

MMA/USPS-6

In answer to NDMS/USPS-T32-29 you estimate the percentage of BY 1996 First-Class single piece nonstandard letters that have paid the nonstandard surcharge. Please estimate the number of First-Class single piece 2-ounce letters that have paid 32 cents for the second ounce (total postage of 64 cents) in BY 1996.

(End of this set of interrogatories)

BULLETIN



BULLETIN

1333 F Street, NW, Suite 710
 Washington, DC 20004-1108
 AmericaPost (BBS): 202-347-6128

Tele: 202-347-0055
 FAX: 202-347-0789
 Hotline: 202-347-0799

AMMA BULLETIN 52-95

DECEMBER 15, 1995

HIGHLIGHTS.....

.....USPS APPROVES AMMA HEAVY-WEIGHT LETTER PETITION--The U.S. Postal Service (USPS) announced it has approved the Advertising Mail Marketing Association's request to increase the maximum permissible weight for automation-rated letters above the present 3.0 ounces. Deputy Postmaster General Michael Coughlin told AMMA that the USPS has been pleased with the results of the tests it has been conducting with a group of AMMA-member companies involving pieces weighing up to 3.5 ounces. USPS officials intend to make the change permanent as soon as the appropriate steps are completed through the DMM regulatory process, which might take as little as three months. In the meantime, mail weighing up to the present minimum per-piece/per-pound break-point (3.3067 ounces for regular rate mail) will continue to be accepted at automation rates on an experimental basis to allow mailers to gain more experience with the preparation of heavier weight automation-rated letters.

[Unrelated Material Deleted]

OFFICERS

Chairman
 William Searl
 Harte-Hanks Direct Marketing PL

Executive Vice Chairman
 Cary M. Sear
 Reader's Digest USA

Secretary
 Jennifer E. Barnett
 Kagan Londonian

Treasurer
 Charles Rubenstein
 Curran, Inc.

DELEGATES

Regional Delegates
 M&B/Adwords, Inc.

David M. Baumgarten
 Radio Shack Int'l Corp.

William G. Berkley
 Treason Int'l Corp.

James E. Brasher
 Simon & Schuster

Kelly G. Browning
 American Inst. for Cancer Research

Harvey A. Bussell
 Harte-Hanks Direct

David Gaby
 EMG Direct Marketing Inc.

Joseph H. Dandekar
 Gross Enterprises

Lee Gershtein
 MAILMEN Inc.

David Press
 The Mail Company

Vivian G. Glickson
 ADQ, Inc.

Steven M. Gold
 Lifenet Vermont Corporation

Dennis Goldberg
 ASOP

Colleen M. Hoyt
 Coleman W. Hoyt, Consultant

M. Jerome Jankovic, Jr.
 Frontier Computers, Inc.

Gene Kaye
 DIMAG DIRECT

Richard Krupnik
 News Color Press

Quinn A. Kyrer
 TRW Direct Marketing Services

Thomas A. Lopez
 Publishers Clearing House

Arthur A. Lindner
 Color Graphics Inc.

Joe Lubliner
 Marston Corp.

Christopher A. MacFarland
 L. L. Bean Inc.

James G. Mack
 Outdoor World (USA) Corp.

Daniel J. Minkoff
 Direct Marketing Technology Inc.

Mike Motta
 Mass Amigos Company

James G. O'Brien
 Time Inc.

Joseph G. Patton
 The Columbia House Company

Yvonne Pomeroy
 Sears and Roebuck Home Services, Inc.

Walter G. Puffer
 Newsline Publishers Inc.

Dana Puffer
 Marston Corporation

Robert A. Pinski, Jr.
 Occasions Direct & Direct Club, Inc.

Luella E. Pridmore
 American Signpost

Robert M. Reichert
 Reader Press Inc.

George R. Robinson
 Dun & Hummel International

Jack E. Rosenblatt
 Harbor Direct Inc.

Joseph E. Sallitt
 QuabbinDirect Inc.

Ray Scharf
 H.S. Shapiro Inc.

William M. Shalton
 Conveyer Marketing Inc.

STAFF

President
 Gary M. Sear, President, P.M.A.

Administrative Director
 Carol A. Matthews

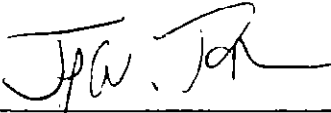
Creative Public Affairs
 Chad W. Robinson

Director, Postal & Agency Services
 Kathleen Glickson

General Counsel
 Lee Glickson, Esq.
 Joseph Glickson, Esq.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail,
upon the participants requesting such service in this proceeding.



Jeffrey Plummer

September 16, 1997

GENERAL INSTRUCTIONS FOR ANSWERING INTERROGATORIES

A. If the witness to whom a particular Interrogatory or Request for Production of Documents is directed is unable to respond, the witness and his or her lawyers should redirect the question or request to another Postal Service witness who can answer the question or comply with the request. If the Postal Service believes that none of its witnesses can respond to an Interrogatory or Request, it is asked to advise MMA counsel of its position promptly by facsimile message to Telecopy Number 202-293-4377.

B. In interpreting the wording of an Interrogatory or Request for Production of Documents, please do not be hypertechnical or grudging. A witness is often able to ascertain what information is being sought even if the Interrogatory or Request is not worded precisely or correctly. Similarly, an Interrogatory or Request may seek information that is not available, but the witness will know about the availability of other, somewhat different information that the requesting party could use in lieu of the unavailable information. In such cases, the witness is asked to interpret the Interrogatory or Request generously, providing the information that the requesting party would have asked for if that party had phrased the inquiry more precisely or know about the available information.

C. If the Interrogatory or Request for Production of Documents requests information that the Postal Service has previously supplied in this proceeding, please state and identify

the document in which that information was provided. Identify any Library References and Workpapers that also contain information relevant to the Interrogatory or Request.

D. The witness should provide all workpapers that are relevant to the witness' response to an Interrogatory or Request for Production of Documents.

E. As used in an Interrogatory or Request for Production, the term "documents" includes, but is not limited to: letters, memoranda, reports, studies, testimonies, pamphlets, newspaper clippings, tabulations, drafts and workpapers by whatever means created, recorded, stored or transmitted, together with any written material necessary to understand or use such documents. The term "workpapers" includes all back-up material, whether prepared manually, mechanically or electronically, and should set forth the calculations of costs, prices, rates or statistical analyses created by or for the witness in preparing his testimony, together with explanatory information sufficient to permit replication of the arithmetic steps depicted in such workpapers.

F. In referring to a document, please cite the complete title, author, publisher and date of publication. References should cite page and line, if possible. Unless the document is testimony filed in this proceeding, please state the document's location and, if not published, the identity, location and telephone number of the document's custodian.

G. When a witness is asked to provide data or a document, the request should be interpreted as asking for information that

is available to the Postal Service and that the witness knows about or has the ability to locate without reasonable burden. In determining what information is "available" to the Postal Service, within the meaning of Section 25 of the Commission's Rules of Practice, the witness should follow the Presiding Officer's Ruling No. R94-1/18 (p. 6), that: "The available is that which it is possible to obtain." (See also Presiding Officer's Ruling No. R94-1/38, p. 5; legal authorities cited in MMA's May 10, 1994 Request for Leave to File Response and June 16, 1994 Response to Postal Service's Motion to Compel, both in Docket No. R94-1.) In the event that the requested party does not provide the information because the requested party believes that doing so would be an unreasonable burden, the requested party is expected to make the showing required under Rule 25(c) of the Commission's Rules of Practice and Procedure.

H. In the event that answering the request requires the Postal Service to compile information, to perform research or to make analyses, the Postal Service is requested to comply with the principles stated in Presiding Officer's Ruling No. R94-1/18 (pp. 5-6) and other Commission Orders in Docket No. R94-1 concerning MMA's discovery requests and motions to compel and the Postal Service's objections thereto. (See also Federal court decisions cited in MMA's June 16, 1994 Response to Postal Service's Motion to Compel.) In the event that the requested party does not provide the information because the requested party believes that doing so would be an unreasonable burden, the requested party is expected to make the showing required under Rule 25(c) of the Commission's Rules of Practice and Procedure.