

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997)
_____)

Docket No. R97-1

SECOND SET OF INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS
JOE ALEXANDROVICH (USPS-T-5)

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 witness is requested to follow the General Instructions that are set forth in the Attachment to the First Set of Interrogatories to this witness. Requests for data or documents are to be interpreted in accordance with General Instructions G and H. If the designated witness is unable to respond to any interrogatory, the Postal Service is asked to redirect the question to another Postal Service witness who can answer it.

Respectfully submitted,

MAJOR MAILERS ASSOCIATION



Richard Littell
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September 16, 1997

**MMA INTERROGATORIES TO USPS WITNESS
(Joe Alexandrovich: Set Two)**

MMA/USPS-T5-8.

In your response to DMA/USPS-T4-27 you indicate that the calculations for the peak load adjustments have been modified in this proceeding from those similar calculations in previous dockets since Docket No. R87-1 "to be consistent with the testimonies of witnesses Bradley, USPS-T-14 and Degen, USPS-T-12".

(A) Please confirm that the calculations have been modified to reflect the proposed Postal Service's position that labor processing costs are not 100% variable. If you cannot confirm, please explain.

(B) Do you agree that the impact of the peak load cost adjustment is smaller because of the position referred to in paragraph (A)? If not, please explain.

(C) Please explain how an intervenor in this proceeding can derive comparable peak load adjustments for First-Class Mail and Standard Mail A under the assumption that labor processing costs are 100 percent variable.

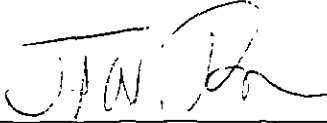
(D) Please provide the peak load cost adjustments for First-Class and Standard Mail A under the assumption that labor processing costs are 100% variable.¹

(End of this set of Interrogatories)

¹ Recognizing the Presiding Officer has not yet ruled on MMA's September 8 Motion to Compel, MMA is agreeable to having the Postal Service defer its Response or Objection to Subparts (C) and (D) of this Interrogatory until the Presiding Officer rules.

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