

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)
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Docket No. R97-1

THIRD SET OF INTERROGATORIES
OF MAJOR MAILERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS
SHARON DANIEL (USPS-T-29)

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



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September 16, 1997

**MMA INTERROGATORIES TO USPS WITNESS
(Sharon Daniel: Set Three)**

MMA/USPS-T29-5.

Please refer to your response to MMA/USPS-T29-1(G) and LR-H-108, Table 1.

Please confirm that from the data provided in the library reference, the average weight of a Standard Mail A bulk regular rate letter-shaped piece of mail in FY 1996 was 1.0 ounces. If you cannot confirm, please explain.

MMA/USPS-T29-6.

Please refer to USPS-29C, pages 1 and 2. Please confirm the following unit costs (mail processing plus delivery)(in cents rounded) and rates shown below that are proposed by the Postal Service in this proceeding. Please assume no destination entry discount for Standard A Regular.

<u>Mail Category</u>	<u>Unit Cost</u>	<u>Unit Rate (1 oz)</u>	<u>Unit Rate (2 oz)</u>
First-Class:			
Basic Automation	9.0	27.5	50.5
3-Digit Automation	8.2	26.5	49.5
5-Digit Automation	6.6	24.9	27.9
Standard A Regular:			
Basic Automation	8.7	18.9	18.9
3-Digit Automation	8.15	17.8	17.8
5-Digit Automation	6.8	16.0	16.0

MMA/USPS-T29-7.

Please confirm that:

(A) The rates for Standard Mail A Regular Automation letter do not change as long as the weight of the letter remains 3 ounces or less. If you cannot confirm, please explain.

(B) You do not know whether or to what extent the cost for a Standard Mail A Automation letter changes as long as the weight of the letter remains three ounces or less. If you cannot confirm, please explain.

MMA/USPS-T29-8

Please refer to your responses to paragraphs (A) and (B) MMA/USPS-T29-2-4.

There you indicate that you do not agree that the unit cost estimates for mail processing and delivery that are provided in USPS-29C, pages 1 and 2 would accurately reflect the cost of a 1.8 ounce or a .9 ounce letter, because the costs shown in your exhibit represent the costs for a letter of “average” weight.

(A) Is this an accurate characterization of your answers to paragraphs (A) and (B) of each of those questions. If not, please explain.

(B) Please provide the “average” weight for each First-Class and Standard Mail A category whose costs are represented in USPS-29C, pages 1 and 2.

(C)(1) Would a 1.8-ounce First-Class Basic Automation letter cost more, less than, or the same as the 9.03 cent cost that you show for an average First-Class Basic Automation letter? Please support your answer.

(C)(2) Would a 1.8-ounce First-Class 3-Digit Automation letter cost more, less than, or the same as the 8.2 cent cost that you show for an average First-Class 3-Digit Automation letter? Please support your answer.

(C)(3) Would a 1.8-ounce First-Class 5-Digit Automation letter cost more, less than, or the same as the 6.6cent cost that you show for an average First-Class 5-Digit Automation letter? Please support your answer.

(D)(1) Would a .9-ounce First-Class Basic Automation letter cost more,

less than, or the same as the 9.03 cent cost that you show for an average First-Class Basic Automation letter? Please support your answer.

(D) (2) Would a .9-ounce First-Class 3-Digit Automation letter cost more, less than, or the same as the 8.2 cent cost that you show for an average First-Class 3-Digit Automation letter? Please support your answer.

(D) (3) Would a .9-ounce First-Class 5-Digit Automation letter cost more, less than, or the same as the 6.6 cent cost that you show for an average First-Class 5-Digit Automation letter? Please support your answer.

(E) (1) Would a .9-ounce Standard Mail A Basic letter cost more, less than, or the same as the 8.7 cent cost that you show for an average Standard Mail A Basic Automation letter? Please support your answer.

(E) (2) Would a .9-ounce Standard Mail A 3-Digit Automation letter cost more, less than, or the same as the 8.1 cent cost that you show for an average Standard Mail A 3-Digit Automation letter? Please support your answer.

(E) (3) Would a .9-ounce Standard Mail A 5-Digit Automation letter cost more, less than, or the same as the 6.8 cent cost that you show for an average Standard Mail A 5-Digit Automation letter? Please support your answer.

MMA/USPS-T29-9.

Please refer to your responses to paragraphs (C) and (D) of MMA/USPS-T29-2-4, where you cannot confirm that the cost (mail processing and delivery) for two .9-ounce letters (one First-Class and one Standard Mail A) is more than the cost

for one 1.8-ounce letter (First-Class).

(A) Please confirm that the Postal Service does not know what costs more, two .9-ounce letters (one mailed at First-Class Basic Automation rates and one mailed Standard Mail A Basic Automation rates) or one 1.8-ounce letter mailed at First-Class Basic Automation rates?

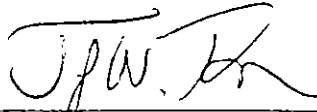
(B) Please confirm that the Postal Service does not know what costs more, two .9-ounce letters (one mailed at First-Class 3-Digit Automation rates and one mailed Standard Mail A 3-Digit Automation rates) or one 1.8-ounce letter mailed at First-Class 3-Digit Automation rates?

(C) Please confirm that the Postal Service does not know what costs more, two .9-ounce letters (one mailed at First-Class 5-Digit Automation rates and one mailed Standard Mail A 5-Digit Automation rates) or one 1.8-ounce letter mailed at First-Class 5-Digit Automation rates?

(End of this set of Interrogatories)

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