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

THIRD SET OF INTERROGATORIES OF MAJOR MAILERS ASSOCIATION TO UNITED STATES POSTAL SERVICE WITNESS DAVID R. FRONK (USPS-T-32)

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 were 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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Suite 400

Washington, DC 20036 Phone: (202) 466-8260

September 16, 1997

MMA INTERROGATORIES TO USPS WITNESS (David R. Fronk: Set Three)

MMA/USPS-T32-28.

Please refer to your response to MMA/USPS-T32-11(H). When First-Class and Standard letters are processed separately on the same equipment, are the same separation schemes for each class generally used? If not, how do Postal employees modify the separation schemes, depending upon which class of mail is being processed?

MMA/USPS-T32-29.

Please refer to your response to MMA/USPS-T32-21(b). There you refer to the cost pool for culling cancellation and metered mail preparation costs as shown in LR-H-106, page II-11. Please indicate precisely where that cost pool is on that page, and explain how this cost pool is included for single piece letters but excluded for bulk metered letters.

(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