

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

POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Major Mailers Association's Second Set Of
Interrogatories And Document Production Requests To United States
Postal Service Witness Marc D. McCrery (MMA/USPS-T29-5)
(May 12, 2005)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to United States Postal Service Witness Marc D. McCrery (MMA/USPS-T29-5).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
May 12, 2005**

MMA/USPS-T29-5

In Interrogatory MMA/USPS-T16-5C, USPS witness Kelly was asked about the delivery costs that would occur for two non-DPSed machinable letters that are identical, except one letter is prebarcoded and presorted whereas the other is not prebarcoded or presorted. In response to that interrogatory, USPS witness Kelly stated, in part:

Assuming that both letters need to be cased in order to be delivered, the in-office unit costs for the presorted and prebarcoded letter should be lower since the casing rate, on average, for the prebarcoded and presorted letter is expected to be higher than for the piece that is not prebarcoded nor presorted.

Please explain all reasons why the casing rate for the prebarcoded and presorted letter is expected to be higher than for the piece that is “not prebarcoded nor presorted.” In addition, please provide any studies or other information that support your explanation.