

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

POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Major Mailers Association's
First Set Of Interrogatories And Document Production Requests To
United States Postal Service Witness Robert L. Shaw, Jr. (MMA/USPS-T2-1)
(May 13, 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 Robert L. Shaw, Jr. (MMA/USPS-T2-1).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
May 13, 2005**

MMA/USPS-T2-1

In response to interrogatory MMA/USPS-T16-6, USPS witness Kelly indicates that IOCS data relied upon by USPS witness Schenk in R2001-1 to separately allocate segment 6 costs according to indicia paid is no longer being produced.

- A. Please explain exactly why the Postal Service decided to modify the IOCS in order to stop collecting such data in the form it was collected prior to R2001-1. Please provide all documents and any other information that refers to the Postal Service's decision to stop producing this IOCS data.
- B. Please indicate how difficult it would be to produce such data (1) for this rate case and (2) for a future rate case.