

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

POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Major Mailers Association's Third Set Of
Interrogatories And Document Production Requests To United States
Postal Service Witness Marc D. McCrery (MMA/USPS-T29-6-12)
(May 24, 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-T29-6-12). If the designated witness cannot answer part or all of any interrogatory, the witness and his counsel should redirect the request to another USPS witness who can respond.

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
May 24, 2005**

MMA/USPS-T29-6

In response to Interrogatory MMA/USPS-T21-4A, USPS witness Abdirahman indicates that he relied on a mail flow density study performed by USPS witness Miller in Docket No. R2000-1. The results of that study can be found on page 55 of Library Reference USPS-LR-K-48. According to that study, 26.34% of the letters processed by the Outgoing ISS, 34.00% of the letters processed by the Outgoing OSS and 6.59% of the letters processed by the outgoing automation primary can be sorted directly to the incoming secondary sort operation. Please explain precisely how the outgoing operations in the ISS and the OSS can sort up to 5 times the amount of letters directly to the incoming secondary than the outgoing operations in the automation primary can sort directly to the incoming secondary?

MMA/USPS-T29-7

In response to Interrogatory MMA/USPS-T21-4C, USPS witness Abdirahman stated, in part:

Density tables are affected by bin capacity on the Bar Code Sorters (BCS). During the 1999 to 2004 time period, it is my understanding that the bin capacity for those machines did not change dramatically change. [sic]

- A. For FY 1999, please provide the bin capacity of Bar Code Sorters used in the following operations:
 - 1. Outgoing Remote Bar Coding System
 - 2. Outgoing Automation Primary
 - 3. Outgoing Automation Secondary
 - 4. Incoming Remote Bar Coding System
 - 5. Incoming Automation Primary
 - 6. Incoming Automation Secondary

- B. For BY 2004, please provide the bin capacity of Bar Code Sorters used in the following operations:
 - 1. Outgoing Remote Bar Coding System
 - 2. Outgoing Automation Primary
 - 3. Outgoing Automation Secondary

4. Incoming Remote Bar Coding System
 5. Incoming Automation Primary
 6. Incoming Automation Secondary
- C. Is the bin capacity of Bar Code Sorters expected to change by TY 2006? If you answer yes, please provide the bin capacity of Bar Code Sorters used in operations 1-6 of Part B.
- D. Do you agree with USPS witness Abdirahman's conclusion that bin capacities have not changed dramatically between FY 99 and the test year in this case? Please explain your answer.

MMA/USPS-T29-8

In R2001-1, USPS witness Kingsley provided the following information in response to Interrogatory KE/USPS-T39-13F.

Volume of Barcoded and Non-barcoded Letters (000)

| Subclass | Letters with USPS Applied Barcodes | Letters with Mailer Applied Barcodes | Letters Without Barcodes |
|--------------|------------------------------------|--------------------------------------|--------------------------|
| FY 1999 | | | |
| First Class | 38,911,824 | 47,000,370 | 9,829,438 |
| Standard | 4,946,688 | 29,304,609 | 7,373,399 |
| Total | 43,858,512 | 76,304,979 | 17,202,837 |
| FY 2000 | | | |
| First Class | 39,230,428 | 50,097,557 | 9,105,107 |
| Standard | 4,016,695 | 33,617,045 | 6,765,283 |
| Total | 43,247,124 | 83,714,601 | 15,870,390 |
| FY 2001 | | | |
| First Class | 38,980,010 | 52,800,062 | 8,467,994 |
| Standard | 3,664,574 | 37,299,240 | 5,699,796 |
| Total | 42,644,584 | 90,099,302 | 14,167,790 |
| AP 12, FY 01 | | | |
| First Class | 2,847,333 | 4,066,708 | 567,350 |
| Standard | 160,208 | 2,582,785 | 379,404 |
| Total | 3,007,541 | 6,649,493 | 946,754 |
| AP 13, FY 01 | | | |
| First Class | 2,610,868 | 3,803,057 | 545,863 |
| Standard | 112,854 | 2,805,734 | 363,027 |
| Total | 2,723,722 | 6,608,791 | 908,890 |

Please provide similar information in the following table for BY 2004 such that the total of the three columns equals the total number of letters in the system.

| Subclass | Letters with USPS Applied Barcodes | Letters with Mailer Applied Barcodes | Letters Without Barcodes |
|--------------------|---|---|---------------------------------|
| First Class | | | |
| Standard | | | |
| Total | | | |

MMA/USPS-T29-9

In R2001-1, the USPS provided information regarding nonmachinable First-Class letters in its response to POIR #4, Question 6.

A. Please provide similar information by filling in the following table for BY 04.

| Subclass | Non-Barcoded Non-Machinable Letters |
|-------------------------|--|
| First-Class S.P. | |
| First-Class Bulk | |
| Total | |

B. Do the volumes provided in your answer to part A include volumes that are nonmachinable but do not pay the nonmachinable surcharge because they weigh more than one ounce? If no, please explain exactly what the volumes provided in your answer to part A represent.

C. If your answer to part B is yes, please provide the volumes that are nonmachinable but do not pay the nonmachinable surcharge because they weigh more than one ounce?

MMA/USPS-T29-10

Please refer to your response to Interrogatory MMA/USPS-T29-2J where you indicate that 27.3 billion pieces were fed into the AFCS operation in FY 2004.

A. How many pieces were fed into the RBCS operation?

B. Of the pieces fed into the RBCS operation, how many pieces left that operation (1) with a barcode sprayed on by the Postal Service, (2) with no barcode, and (3) with a barcode that had already been provided by

the mailer? If your volume figures do not add up to 27.3 billion, please provide a description of what happened to the remaining pieces.

MMA/USPS-T29-11

Please refer to your response to Interrogatory MMA/USPS-T29-4B. You state that 89% all letters in the system were DPSed in FY 2004. You also explain that in the last case, USPS witness Kingsley’s stated that 94.9% of the letters that could be DPSed in offices where automation equipment was being used was DPSed. For BY 2004, please provide (1) the actual number of letters that were DPSed, (2) the number of letters sent to offices where that mail could be DPSed, and (3) the total number of letters in the system.

MMA/USPS-T29-12

Please refer to your response to Interrogatory MMA/USPS-T29-4C where you filled in the following table:

| Subclass | Total Barcoded Letters | Total DPSed Letters | Total Letters That Do Not Require DPSing | Total Letters Not Able To Be DPSed |
|-----------------|-------------------------------|----------------------------|---|---|
| | (1) | (2) | (3) | (4) |
| First Class | | | | |
| Standard | | | | |
| Total | 140.9 | 113.2 | 13.9 | 19.2 |

- A. Please explain why column (1) is 140.9 and the sum of columns (2) through (4) is 146.3.
- B. Do the 13.9 billion pieces that did not require DPSing in column (3) include non-barcoded letters? If not, please explain exactly what these 13.9 billion pieces represent.
- C. If column (3) includes non-barcoded letters, please provide the number of barcoded letters that did not require DPSing.