

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

POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Notice Of Major Mailers Association Regarding
Filing Of Corrected Pages For The
Fifth Set Of Interrogatories And Document Production Requests To United
States Postal Service Witness John Kelley (MMA/USPS-T16-22-25) Errata
(June 6, 2005)**

Major Mailers Association (MMA) hereby gives notice of filing (1) a corrected cover page for the Fifth Set Of Interrogatories And Document Production Requests To United_States Postal Service Witness John Kelley, filed June 3, 2005 and (2) corrections to Interrogatory MMA/USPS-T16-22 C. The cover page inadvertently listed only the first (**MMA/USPS-T16-22**) of several interrogatories submitted by MMA. Interrogatory MMA/USPS-T16-22 C contained typographical errors and omissions.

The corrected pages are attached.

Respectfully submitted,

Major Mailers Association

By: _____

Michael W. Hall
35396 Millville Road
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540-687-3151

**Counsel for
Major Mailers Association**

Dated: Middleburg, Virginia
June 6, 2005

**BEFORE THE
POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Major Mailers Association's
Fifth Set Of Interrogatories And Document Production Requests To United
States Postal Service Witness John Kelley (MMA/USPS-T16-22-25)
(June 3, 2005)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association submits the following interrogatories and document production requests to United States Postal Service Witness John Kelley (MMA/USPS-T16-22-25).

Respectfully submitted,

Major Mailers Association

By: _____

Michael W. Hall
35396 Millville Road
Middleburg, Virginia 20117
540-687-3151

Counsel for
Major Mailers Association

**Dated: Middleburg, Virginia
June 3, 2005**

MMA/USPS-T16-22

Please refer to Library Reference LR-USPS-K-67 (revised), worksheet 9; Library Reference LR-USPS-K-101, worksheet "Delivery Volumes"; and your response to MMA-USPS-T16-17D. You provide BY 2004 volumes for First-Class letters in all three sources.

- A. Please confirm and correct the volumes shown below from all three sources for rural route carriers and explain any differences.

	Rural Route Volumes (000)		
First-Class Category	LR-K-67	LR-K-101	Int. MMA 17D
Single Piece Letters	6,955,698	10,276,825	10,276,825
Single Piece Flats	645,373	913,445	913,445
Single Piece Parcels	113,585	6,557	6,557
Total Single Piece	7,714,656	11,196,827	11,196,827
Presort Letters	12,293,318	12,391,555	12,391,542
Presort Flats	198,472	99,790	99,790
Presort Parcels	1,793	2,251	2,251
Total Presort	12,493,583	12,493,595	12,493,583

- B. Please confirm and correct the volumes shown below from all three sources for city carriers and explain any differences.

	City Carrier Volumes (000)		
First-Class Category	LR-K-67	LR-K-101	Int. MMA 17D
Single Piece Letters	17,565,046	17,565,046	17,548,389
Single Piece Flats	1,701,042	1,701,042	1,634,457
Single Piece Parcels	237,599	237,599	320,840
Total Single Piece	19,503,687	19,503,686	19,503,687
Presort Letters	29,355,620	29,355,620	29,201,824
Presort Flats	477,831	470,464	630,826
Presort Parcels	3,754	11,121	4,555
Total Presort	29,837,205	29,837,205	29,837,205

- C. Are the BY 2004 Single Piece Metered Letter volumes for City Carriers and Rural Carriers, that you provided in response to Interrogatory MMA/USPS-T17D, actual volumes or official USPS estimates? If so, please provide source(s) for those volume figures. If not, please explain

exactly how you determined or derived the city and rural carrier volumes for metered letters.

- D. Please provide a fully revised Library Reference LR-USPS-LR-101 with the corrected volumes for the base year.

MMA/USPS-T16-23

Please refer to your response to MMA/USPS-T16-16 where you provide the unit delivery costs of DPSed and non-DPSed presorted letters.

- A. Please confirm that the BY 2004 unit costs of 2.28 and 10.35 cents for DPSed and Non-DPSed letters, respectively, represent not the actual unit costs to deliver each piece but unit costs calculated by dividing (1) the total cost to deliver all pieces that are delivered by rural and city carriers by (2) all presorted letters, including those that are not actually delivered by city or rural carriers. If you cannot confirm, please explain.
- B. Please provide the BY volume variable unit cost incurred by the Postal Service to deliver (via a city carrier or rural carrier) a (1) DPSed and (2) Non-DPSed presorted letter and provide your computations and sources.

MMA/USPS-T16-24

Please refer to your responses to MMA/USPS-T16 B and C. In MMA/USPS-T16 B, you were asked to provide a judgment as to how the unit cost of a nonpresorted letter would compare to the unit cost of a workshare letter if neither letter was DPSed. You responded as follows:

I do not know. I have not compared the unit delivery costs between a workshared letter and a single piece letter that is not DPSed.

In MMA/USPS-T16 C, you were asked to provide a judgment as to how the unit cost of a nonpresorted letter would compare to the unit cost of a workshare letter, if both letters were DPSed. Again, you responded as follows: