

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

POSTAL RATE AND FEE CHANGES

Docket No. R2005-1

**Major Mailers Association's
Sixth Set Of Interrogatories And Document Production Requests To
United States Postal Service Witness John Kelley (MMA/USPS-T16-26-29)
(June 13, 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-T16-26-29).

Respectfully submitted,

Major Mailers Association

By: _____

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

MMA/USPS-T16-26

Please refer to your response to Interrogatory MMA/USPS-T16-13 where you provided the collection costs that were included in your single piece letter delivery costs as part of your analysis provided in Library Reference LR-USPS-K-67. Please provide the same information, i.e. the collection costs, with respect to the 5.84 unit cost figure derived for First-Class letters using the PRC delivery cost methodology in Library Reference LR-USPS-K-101.

MMA/USPS-T16-27

Please refer to Library References LR-USPS-K-67 and LR-USPS-K-101.

- A. For each of these library references, please indicate whether the costs used to develop the unit delivery costs include costs associated with First Class letters that are not delivered by city or rural carriers (e.g. letters addressed to post office boxes). If there are any such costs, please provide the total costs, the associated volumes, a description of what such costs represent, and the source(s) for the data you provide.
- B. If the referenced Library References do not contain any costs or volumes associated with deliveries of First Class letters other than by city or rural carriers, please indicate where the costs and volumes associated with such other delivery activities may be found in the R2005-1 record.

MMA/USPS-T16-28

Please refer to your response to Interrogatory MMA/USPS-T16-16 where you revised the TY 2006 unit delivery cost for presorted letters as 10.92 and 2.41 cents for NonDPS and DPS letters, respectively.

- A. Please confirm that the comparable costs from Library Reference LR-USPS-K-101 are 3.51 and 0.3 cents for NonDPS and DPS letters, respectively. If you cannot confirm, please explain.

- B. Please explain why the Postal Service's new delivery cost methodology would raise the NonDPS unit cost by more than three times, from 3.51 cents to 10.92 cents.
- C. Please explain why the Postal Service's new delivery cost methodology would raise the NonDPS unit cost by more than eight times, from .3 cents to 2.41 cents.
- D. Please explain why the Postal Service's new delivery cost methodology would more than double the DPS unit savings, from 3.21 cents, (2.41 - 0.30) to 7.41 cents (10.92 - 3.51).

MMA/USPS-T16-29

Please compare the unit costs and operational differences between a nonDPSed letter and a DPSed letter. Is there a specific relationship between the carrier route sequencing cost of the two types of letters such that the unit cost for the nonDPSed letter is dependent upon the unit cost for the DPSed letter? If so, please explain that relationship. If not, then would you agree that the unit cost for the nonDPSed letter has **no** relation to the unit cost of the DPSed letter?