

**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 The United States Postal Service (INSTITUTIONAL) (MMA/USPS-11)
(June 17, 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 the United States Postal Service for institutional responses (**MMA/USPS-11**).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
June 17, 2005**

MMA/USPS-11

Please refer to Interrogatory MMA/USPS-5, which, in relevant part, asked the Postal Service to provide the following information:

Using other Postal Service data systems that do provide information about First-Class workshare mail volumes by pieces, please provide, separately, the number of letters and the number of cards that the 38 PostalOne! Users mailed during FY 2004.

The complete Postal Service response was as follows (emphasis added):

This information is not available. For a specific mailer at a specific mail production facility, the Postal Service cannot determine what portion of the mail is processed through a PostalOne! Transportation Management shipping system and what is not.

The Postal Service's answer is not responsive to the question posed by MMA. The referenced interrogatory did **not** request the 38 PostalOne! Customers' mail volumes to be broken down between volumes "processed through a PostalOne! Transportation Management shipping system" and volumes sent by other means; the only breakdown MMA sought was between total **letter** volumes and total **card** volumes. Nor did MMA's interrogatory ask for mail volume information to be broken down by "a specific mailer at a specific mail production facility."

With these clarifications, using Postal Service data systems that provide information about First-Class workshare mail volumes by pieces, please provide the total number of First-Class workshare letters and, separately, the total number of First-Class workshare cards mailed during FY 2004 by the 38 mailers you have identified as users of PostalOne!