

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

**POSTAL RATE AND FEE CHANGES**

**Docket No. R2005-1**

**Major Mailers Association's Follow-up  
Interrogatories And Document Production Requests  
To The United States Postal Service (INSTITUTIONAL) (MMA/USPS-12-13)  
(June 21, 2005)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following follow-up interrogatories and document production requests to the United States Postal Service for institutional responses (**MMA/USPS-12-13**).

Respectfully submitted,

**Major Mailers Association**

By: \_\_\_\_\_

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### **MMA/USPS-12**

Please refer to USPS witness Kelley's response to Interrogatory MMA/USPS-T16-19 where he indicates that the rural route volumes shown in Library Reference LR-USPS-K-101, on worksheet "Delivery Volumes", include collected volumes in addition to delivered volumes. Why has the Postal Service computed the "Implicit PO Box Volume" (14,461,233), as shown on that same page by subtracting from total RPW volumes (45,161,746) the sum of (1) city carrier volume delivered (19,503,687), (2) rural route volume delivered (7,714,656) **and** (3) rural route volume collected (3,482,171)?

### **MMA/USPS-13**

Please refer to USPS witness Kelley's response to Interrogatory MMA/USPS-T16-22 C where he explains how he estimated the First-Class metered mail letter volumes that were delivered by city carriers and rural carriers and the First-Class metered mail letter volume delivered to post office boxes. If the rural carrier volume that he used in his computation, 10,276,825, includes collected volumes, then isn't the "BY P.O. Box Volume" figure of 13,106,846 incorrect? If the figure of 13,106,846 is not correct, please provide the correct figure for the implicit volume delivered to post office boxes. If that is the correct figure, please explain why the volume of letters collected, which is included in the rural carrier volume figure of 10,276,825, should be subtracted from total letters delivered in order to compute the implicit volume delivered to post office boxes.