

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION  
(MMA/USPS-11)  
(July 1, 2005)

The United States Postal Service hereby files its institutional responses to interrogatory MMA/USPS-11 of Major Mailers Association, filed on June 17, 2005.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,  
UNITED STATES POSTAL SERVICE

By its attorneys:

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TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION

**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!

**RESPONSE:**

Despite the invective, the requested information remains unavailable. However, in FY2004 the 38 mailers entered 9,431,482,023 workshare letters and 115,771,785 workshare cards using permits held in their own names. Some undeterminable subsets of these pieces were entered using PostalOne.