

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**Major Mailers Association's
Follow Up Interrogatories and Document Production Requests To
United States Postal Service Witness Altaf H. Taufique (MMA/USPS-T32-8)
(July 31, 2006)**

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 Altaf H. Taufique (MMA/USPS-T32-8).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
July 31, 2006**

MMA/USPS-T32-8

Please refer to your response to Interrogatory MMA/USPS-T32-6, particularly where you state, “I am unaware of any studies that demonstrate that either higher or lower costs result based on the volume of mail originating from any one customer.”

A. Please explain why you would need a specific study to conclude that consistently high volume mailings from one mailer have a positive impact on Postal costs (i.e. results in lower unit costs for the Postal Service) with respect to operations such as:

1. Mail acceptance
2. Postage verification
3. Tray banding
4. Tray labeling
5. Tray sorting
6. Palletization
7. Pallet labeling
8. Pallet sorting
9. Plant loading
10. Postal One!
11. Transportation

- B. Please compare two mailers. Mailer A consistently sends out 500 1-ounce non-local pieces, all presorted to 5-digits. Mailer B consistently sends out 1 million 1-ounce non-local pieces all presorted to 5-digits. Will Mailer A pay the same unit postage as Mailer B under the current rate structure? If the unit postage paid by the two mailers is different, please explain.
- C. Comparing the two mailers described in Part B, please explain whether the Postal Service’s unit cost for processing Mailer A’s mail would be higher than, lower than, or the same as the unit cost for processing Mailer B’s mail. Please consider all of the costs associated with each operation listed in Part A. If you do not know whether the Postal Service’s unit cost for processing

Mailer A's mail would be higher than, lower than, or the same as the unit cost for processing Mailer B's mail, please so state and explain why.