

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
MAJOR MAILERS ASSOCIATION WITNESS BENTLEY
(USPS/MMA-T1-23-24)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Major Mailers Association witness Bentley: USPS/MMA-T1-23-24.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/MMA-T1-23.

Please refer to Postal Service witness Mitchum's testimony (USPS-T-40) at page 21, lines 17-19. Please confirm that the Postal Service's proposal to eliminate the electronic notice requirement in DMCS 931.31 for Destination Confirm mailings was intended to eliminate a burden from mailers who do not want to provide the notice, and would not affect any mailers who want to provide electronic notice. If you do not confirm, please explain why not.

USPS/MMA-T1-24.

Please refer to your testimony at page 32, lines 3-5, where you state that "[t]he evidence provided by the Postal Service indicates that the costs generated by providing Confirm do not change with the number of scans produced."

(a) Please specifically identify the evidence to which you refer.

(b) Please confirm that for a large increase in the number of scans (especially if this increase is associated with the addition of new subscribers), more calls would be expected at the help desk, increasing help desk costs. If you do not confirm, please explain why not.

(c) Please confirm that for a large increase in the number of scans (especially if this increase is associated with the addition of new subscribers), more travel would be expected to assist customers, increasing travel costs. If you do not confirm, please explain why not.