

DOCKET SECTION

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE
INTERROGATORY TO MMA WITNESS BENTLEY
(USPS/MMA-T1-13)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatory to MMA witness Bentley: USPS/MMA-T1-13.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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January 28, 1998

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
TO MMA WITNESS BENTLEY**

USPS/MMA-T1-13

At page 20 of your testimony you state: "In past studies, the Service's technical staff has uniformly found that the cost of processing two-ounce letters is no more than the cost of processing one-ounce letters ..."

- (a) Please cite all Postal Service technical staff studies which support this claim.
- (b) For each of these studies, describe whether the study includes an analysis of the costs of all facets of mail processing, delivery and transportation costs.
- (c) Please identify which of these studies has been relied upon by the Postal Rate Commission as a basis for recommending additional-ounce rates.
- (d) Please explain how your claim is consistent with Postal Service engineering study results reported at Tr. 4/1761 (Docket No. R97-1) which indicate that automation throughputs are 34,100 pieces per hour with 0 percent heavy weight pieces, while the throughput for 1.75 ounce pieces is 24,710 pieces per hour?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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