

DOCKET SECTION

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

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U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

Postal Rate and Fee Changes, 1997

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Docket No. R97-1

FIRST SET OF INTERROGATORIES OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO MMA WITNESS BENTLEY
(AMMA/MMA-T-1-1-3)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested should be made by photocopies attached to responses to these interrogatories. If production of copies is infeasible due to the volume of material or otherwise the undersigned counsel to AMMA should be contacted to arrange for inspection of the documents.

The term "document" means all repositories of fixed information, including any writing, audio or video recording or electronically stored information and including all non-identical copies or versions of any document.

The term "oral communication" means any utterance that is not a document.

The term "communication" means all documents and oral communications.

The terms "identify," "identification," or "identity" mean:

(1) With respect to an individual, his name and present or last known home and business address (including street name and number, city or town, state, zip code and telephone number).

(2) With respect to a person other than an individual, its full name and type or organization, the address of its principal place of business (including street name and number, city or town, state, zip code and telephone number), the jurisdiction and place of its incorporation or organization, and the identity of all individuals having knowledge of the matter with respect to which the person is named;

(3) With respect to a document, the type of document (e.g., letter, record, list, memorandum, report), date, title or a description of the general nature or subject matter of its contents, identification of the person who prepared the document, identification of the person for whom the document was prepared and/or to whom it was delivered, identification of the person who has possession, custody or control over the original of the document, and identification of each person who has possession, custody or control over each copy of the document.

A communication or document "relating," "related," or which "relates" to any given subject means any communication or document which constitutes, contains, embodies, reflects, identifies, refers to, deal with or is in any way germane to that subject, including without limitation, documents concerning the preparation of other documents.

Responses to requests for explanations of the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers are, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to

achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

AMMA/MMA-T1-1

On page 2, Line 12 through Line 15 of your testimony you state that the Postal "Services Proposed First Class Mail rates be scaled back. My first preference is to have the First Class stamp rate continue at 32 cents. In any event, I propose that the Commission recommend modest reductions in the Services' proposed rates for Automation and 2-ounce letters." Table 1 below summarizes the reduced revenue for each of your preferences/proposals.

<u>Preference/Proposal</u>	<u>Testimony Reference</u>	<u>Revenue Reduction (Million)</u>
(1)	(2)	(3)
1. Retention of 32 cent stamp	Page 11, Line 2	\$800
2. Increase in First Class Automation Discounts	Page 14, Line 16	72
3. Reduce Second Ounce Rate for First-Class Letters	Page 18, Line 19	<u>26</u>
4. Total		\$898

- a. Please confirm the revenue reduction's for each preference/proposal noted in Table 1 above. If you are unable to confirm, please provide the appropriate revenue reduction and explain the cause of the difference with the values in Table 1.

- b. Please show the impact of the proposed revenue reductions noted in Table 1 on the rates and volumes of Standard (A) mail including the rationale for the allocation of all required revenues to Standard (A) mail.

AMMA/MMA-T1-2

Please compare the aggregate value (revenue reductions and costs avoided) for worksharing discounts that occur in Standard (A) mail with the total discounts that occur in First-Class mail. In particular, please address the impact of dropshipping on First-Class vs. Standard (A) costs.


AMMA/MMA-T1-3

On page 16, Lines 5 and Line 6 you note that "An additional 5 billion pieces [of pre-barcode mail] are expected to be attracted in just two more years, as projected by USPS witness Tolley. Such growth needs to have appropriate discounts in order to continue to attract large, new volumes."

Please confirm that the growth projected by Tolley is based upon the rates set forth in USPS Proposal in Docket R97-1. If you are unable to confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



N. Frank Wiggins

DATE: January 28, 1998