

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

**POSTAL RATE AND FEE CHANGES**

**Docket No. R2005-1**

**Major Mailers Association's First Set Of  
Interrogatories And Document Production Requests To United States  
Postal Service Witness Samuel T. Cutting (MMA/USPS-T26-1)  
(May 2, 2005)**

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 Samuel T. Cutting (MMA/USPS-T26-1).

Respectfully submitted,

**Major Mailers Association**

By: \_\_\_\_\_

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**Dated: Middleburg, Virginia  
May 2, 2005**

**MMA/USPS-T26-1**

In Table 1 on page 4 of your testimony, you indicate that First-Class presorted letters incur \$28.911 million in window service costs.

- A. When you use the term “First-Class Presort”, do you mean just nonautomation letters or do you mean nonautomation letters and automation letters?
- B. Are you aware that First-Class workshare letters are either loaded directly onto USPS-controlled trucks by workshare mailers who have plant loading agreements or delivered to the Postal Service at a business mail entry unit (BMEU) or a USPS platform or dock? If no, please explain.
- C. Explain what specific functions window service clerks perform that causes costs to be attributed to First-Class workshare letters.
- D. Please provide all documents and other information you relied upon in reaching your conclusion that First-Class presort letters incur window service costs.