

DOCKET SECTION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-001

Postal Rate and Fees Changes, 1997

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Docket No. R97-1

Joint Interrogatories from
American Bankers Association,
Edison Electric Institute, and
National Association of Presort Mailers
to United States Postal Service
Witness Smith ABA&EEI&NAPM/USPS-ST-45-1-4

(November 14, 1997)

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, American Bankers Association ("ABA"), Edison Electric Institute ("EEI"), and National Association of Presort Mailers ("NAPM") hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service Witness Smith (ABA&EEI&NAPM/USPS-T-25-1-4).

If the designated witness is unable to respond to any interrogatory, the Postal Service is requested to redirect that interrogatory to another Postal Service witness.

Respectfully submitted,

American Bankers Association,
Edison Electric Institute, and
National Association of Presort Mailers

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Joint Interrogatories from
American Bankers Association,
Edison Electric Institute, and
National Association of Presort Mailers
to United States Postal Service
Witness Marc A. Smith

ABA&EEI&NAPM/USPS-ST-45-1. (a) Describe your responsibilities with respect to the preparation of, including the data collection for, LR-H-106.

(b) When was LR-H-106 prepared?

ABA&EEI&NAPM/USPS-ST-45-2. Re LR-H-106 page 11-5. Identify the MODS operations 010 to 028 for MODS cost pool "ICancMMP" which reflect the (a) culling, (b) facing, (c) cancelling, and (d) traying costs for the following first-class letter mail: (i) stamped, (ii) permit imprint, and (iii) metered. As reflected in LR-H-106, provide the unit costs for each of the foregoing operations for each of the foregoing first-class letter mail.

ABA&EEI&NAPM/USPS-ST-45-3. Describe each of the MODS operations which are included in the following MODS cost pools:

- (a) "bcs/"
- (b) "man1"
- (b) "LD15"
- (c) "LD49"
- (d) "LD79"

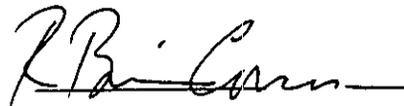
ABA&EEI&NAPM/USPS-ST-4. Re LR-H-106 page 11-5. Under the heading "cost pool" there is a line for "Non MODS". With respect to this line, (a) please explain in detail what Non MODS represents, identify all operations encompassed;

(b) identify the source(s) used to collect this data; and

(c) provide all workpapers and other supporting documentation.

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.



R. Brian Corcoran

November 14, 1997