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POSTAL RATE AND FEE CHANGES, 2001 : Docket No. R2001-1

AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT
MAILERS JOINT INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO UNITED STATES POSTAL WITNESS MICHAEL W. MILLER (USPS T24)
ABA&NAPM/USPS (T24-1-6)

(November 26, 2001)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit these joint interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

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

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, 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.

ABA & NAPM/USPS-T24-1. Please refer to Table 1 at page 14 of your T-24 Direct Testimony. Please provide "Actual Total Mail Processing Unit Costs (Cents) for First Class single piece flats. Why did you not include this information in your Table 1 or in LR-J-61?"

ABA & NAPM/USPS-T24-2 - Please confirm that mail processing unit cost savings of automated flats are an important factor in setting discounts for automated flats. If you can not confirm this fact, explain why not.

ABA & NAPM/USPS-T24-3 - Why did you calculate Total Mail Processing Unit Costs for the various First Class Automated Flats rate categories, but fail to measure worksharing related savings of those rate categories.

ABA & NAPM/USPS-T24-4 - Please calculate worksharing related savings for each First Class Automated Flats rate category, using First Class Single piece flats as the benchmark.

ABA & NAPM/USPS-T24-5 - Do you have any experience from observation of or conversations with presort bureaus or mailers of First Class automated flats which would merit the conclusion that if such flats were not delivered to the Postal Service as First Class Automated Flats, those presort bureaus and other mailers would take the time and resources necessary to deliver those flats as First Class non-automated presorted flats?

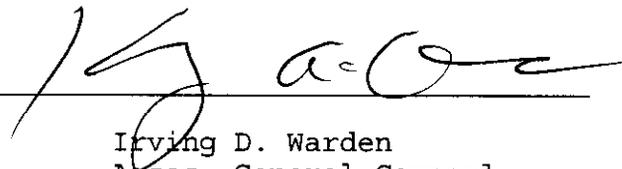
ABA & NAPM/USPS-T22-6 - Do the "Actual Total Mail Processing Unit Costs" in your Table I of your T-24 Direct Testimony include delivery costs? Please confirm that delivery costs are relevant to worksharing related savings of First Class Automated flats.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION

NATIONAL ASSOCIATION OF PRESORT MAILERS

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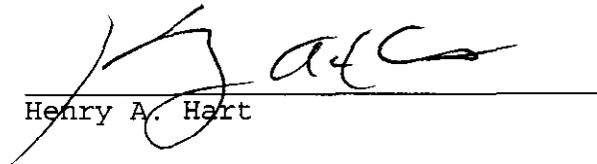
Counsel for
American Banker Association

Date: November 26, 2001

Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

November 26, 2001