

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

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POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

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Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF MAJOR MAILERS ASSOCIATION,  
REDIRECTED FROM WITNESS ABDIRAHMAN  
(MMA/USPS-T21-57 A-C)

The United States Postal Service hereby files its response to the above-listed interrogatory of the Major Mailers Association, filed on May 18, 2005 and redirected from witness Abdirahman.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Nan K. McKenzie

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June 8, 2005

## RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION

### MMA/USPS-T21-57

In your response to Interrogatory MMA/USPS-T21-12, you state “[m]y responsibility is to consider the costs to the Postal Service of different types of mail prepared in accordance with postal regulations.” In your responses to Interrogatories MMA/USPS-T21-14 and 33, you claim that you are not familiar with the manner in which Low Volume (LV) First-Class mailers prepare their mail. (Note that Interrogatory MMA/USPS-T21-14 defined a LV First-Class workshare mailer as a mailer that mails on its own behalf and/or on behalf of other First-Class mailers at least 500 pieces but not more than 2,500 pieces in a given mailing).

- A. According to Postal regulations, are LV First-Class mailers required to present their letters in trays? If no, please explain.
- B. According to Postal regulations, are LV First-Class mailers required to bring their letters to the local post office for acceptance at a window, BMEU or postal loading dock? If no, please explain.
- C. Do you have any reason to believe that LV First-Class mailers are not meeting the requirements necessary to qualify for workshare discounts? If yes, please explain.

### Response:

The Domestic Mail Manual (DMM®) does not differentiate between Low Volume and High Volume workshare mailers.

- A. Yes. All discount First-Class Mail is required to be presented in trays.
- B. Yes. Pursuant to DMM® 236.1.2, “First-Class Mail paid at the Presorted rate or at any automation rate must be deposited at locations and times designated by the postmaster.” There are some provisions that allow for verification at mailers locations (DMM® 604.6.1.10-11- Plant Verified Drop Shipments and DMM® 705 – Advance Preparation and Special Postage Payment Systems) but these would not apply to low volume mailings.
- C. Based upon the available data, most mailings that seek the presort rates comply with the appropriate regulations. However, a small percentage of both large and small mailings are found not to comply.

## **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.

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Nan K. McKenzie

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