

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**Major Mailers Association's
First Set Of Interrogatories and Document Production Requests To
United States Postal Service Witness James W. Page (MMA/USPS-T23-1-4)
(June 20, 2006)**

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 James W. Page (MMA/USPS-T23-1-4).

Respectfully submitted,

Major Mailers Association

By: _____

Michael W. Hall
35396 Millville Road
Middleburg, Virginia 20117
540-687-3151

Counsel for
Major Mailers Association

**Dated: Middleburg, Virginia
June 20, 2006**

MMA/USPS-T23-1

Please refer to Table 14A on page 28 of your direct testimony where you provide the associated test year costs for the Postal Service to provide Confirm Service.

- A. Please explain precisely how the \$460,000 cost for field support varies based on the number of scans provided by the Postal Service to Confirm Service users. Please provide all documents, including special studies that discuss the extent to which field support costs vary with an increase or reduction in the number of scans performed.
- B. Please explain precisely how the \$22,000 cost for promotional activities varies based on the number of scans provided by the Postal Service to Confirm Service users. Please provide all documents, including special studies that discuss the extent to which the costs of promotional activities vary with an increase or reduction in the number of scans performed.

MMA/USPS-T23-2

Please refer to Table 14C on page 29 of your testimony where you provide the test year unit cost analysis for Confirm Service.

- A. Please provide the source for the number 200 total subscribers.
- B. Please explain why you use 200 total Confirm subscribers and USPS witness Mitchum uses 180 total Confirm subscribers for the base year and test year. See USPS-T-40, WP-4.
- C. Please confirm that the unit volume variable cost of \$2,410 is not the cost associated with the number of scans or units but the cost associated with the number of users. If you cannot confirm, please explain.

MMA/USPS-T23-3

On page 29 of your direct testimony, you indicate that you verified which Confirm Service costs were variable and which were fixed with "Cost Attribution." Please explain what "Cost Attribution" is and how you were able to verify that you classified correctly which types of costs were variable and which were fixed.

Please provide copies of all written communications you exchanged with Cost Attribution and all notes of conversations you had with Cost Attribution personnel.

MMA/USPS-T23-4

Please refer to Library Reference USPS-LR-L-59, attachment 17 where you provide historical and projected costs for Confirm Service.

- A. For accounts 52359 (Professional and other Miscellaneous Service) and 51401 (Travel Other Than Training), which you determined are volume variable, what are the associated number of scans per year for FY 2000 through FY 2005? Please also provide the source for your answer.
- B. For accounts 52359 (Professional and other Miscellaneous Service) and 51401 (Travel Other Than Training), which you determined are volume variable, what are the associated number of scans per year that you project for FY 2006 through FY 2008? Please also provide the source for your answer.
- C. For accounts 52359 (Professional and other Miscellaneous Service) and 51401 (Travel Other Than Training), which you determined are volume variable, what are the associated number of subscribers per year for FY 2000 through FY 2005? Please also provide the source for your answer.
- D. For accounts 52359 (Professional and other Miscellaneous Service) and 51401 (Travel Other Than Training), which you determined are volume variable, what are the associated number of subscribers per year that you project for FY 2006 through FY 2008? Please also provide the source for your answer.