

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE AND THE
MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS DREW MITCHUM**

(POSTCOM/USPS-T40-1-6)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing and Fulfillment Service Association direct the attached First Set of Interrogatories to Witness Drew Mitchum. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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July 10, 2006

POSTCOM/USPS-T40-1. Regarding your testimony concerning Address Correction Service (“ACS”):

- a. Please identify and describe the specific “barcoding and other requirements specified by the Postal Service” (proposed DMCS § 911.22 at USPS-T-40 p. 11) necessary to qualify for electronic ACS.
- b. Please identify and describe any and all limitations (including but not limited to shape-based and class limitations) on the use of electronic ACS.
- c. Please identify and describe any and all limitations (including but not limited to class limitations and address hygiene requirements) on the use of automated ACS.
- d. Does the Postal Service plan to change any of these requirements or establish any new requirements during the next eighteen calendar months? Please discuss any potential changes and new requirements.

POSTCOM/USPS-T40-2. Please confirm that the Postal Service does not intend to eliminate manual ACS service.

POSTCOM/USPS-T40-3. Please refer to page 8 of your testimony where you state, “First-Class Mail service includes forwarding or returning the mail piece in the price of postage, so the additional cost of providing address correction service via the electronic option is lower for First-Class Mail pieces than for other classes of mail.” Please provide all of the costing and pricing information upon which you relied in drawing this conclusion, or identify this information if the material has already been provided.

POSTCOM/USPS-T40-4. Please refer to page 8 of your testimony where you state, “[w]hile the electronic option for other classes would have a price increase, the mailers choosing this option would benefit from being charged this fee even when they receive manual notices.” In addition, in footnote 2, you state that currently “[t]he application of differential fees can happen even if the mailer has met all of the requirements necessary to receive notices electronically. Please confirm that only the electronic fee will be charged for manual notices received when the mailer elects and meets the requirements for the electronic option under the proposed fee schedule. If confirmed, please describe how the Postal Service will ensure that only the electronic fee will be charged for manual notices received when the mailer elects the electronic option under the proposed fee schedule.

POSTCOM/USPS-T40-5. Please refer to your testimony regarding proposed changes to the Domestic Mail Classification Schedule (“DMCS”) (USPS-T-40 at 10-11) and the proposed changes to the DMCS included in Docket No. R2006-1 Request, Attachment B at 27. In your testimony, you propose to add the following DMCS language: "Automated address correction service is limited to First-Class Mail and Standard Mail mailers who meet address hygiene requirements, as specified by the Postal Service." In addition, in your testimony you state that “[o]nly letters would be eligible for the new automated address correction service because only letters are processed through PARS.” The proposed DMCS language attached to the rate request does not, however, limit automated address correction to First-Class Mail and Standard Mail letters.

- a. Please confirm that the Postal Service proposes to limit automated address correction to First Class Mail and Standard Mail letters. If you cannot confirm, please explain.
- b. Please identify which DMCS language described above the Postal Service proposes.

POSTCOM/USPS-T40-6. Please confirm that automated ACS provides an electronic correction notice.