

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOZZO,
USPS-T-12, TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-T22-18), REDIRECTED FROM WITNESS ABDIRAHMAN, USPS-T-22
(July 3, 2006)**

The United States Postal Service hereby provides the response of Witness Bozzo (USPS-T-12) to the following interrogatory of Major Mailers Association: MMA/USPS-T22-18), filed on June 19, 2006, and redirected from witness Abdirahman (USPS-T-22).

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 3, 2006

Response of United States Postal Service Witness A. Thomas Bozzo,
USPS-T-12, To Interrogatory of Major Mailers Association
Redirected from Witness Abdirahman

MMA/USPS-T22-18

Please refer to Library Reference USPS-LR-L-69, Section B, page 12, where you derive the marginal productivities for high volume QBRM.

- A. Please confirm that the 85% volume variability factor means that, if the volume being counted increases by 100%, the cost to count those pieces increases by just 85%. If you cannot confirm, please explain.
- B. Please explain specifically why, if you manually count 20,000 pieces of QBRM, the time necessary to count the 20,000 pieces is only 185% of the time to count 10,000 pieces rather than twice the time to count 10,000 pieces.

Response.

A. Confirmed.

B. Please see USPS-T-12 at page 83, lines 12-20.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Frank R. Heselton

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