

**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 SAMUEL T. CUTTING**

(POSTCOM/USPS-T26-1)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein collectively "PostCom") direct the attached First Set of Interrogatories to Witness Samuel T. Cutting. 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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POSTCOM/USPS-T26-1. In your testimony at p. 11, line 9 you state that unit cost differences in the processing of electronic notices "are primarily driven by shape."

Witness McCrery states in USPS-T-42 at 18 that PARS will be implemented for flats at all processing plants that handle flat mail and the delivery units they service beginning in February 2008.

a. How will the implementation of PARS for flats affect the unit-cost differences by class for Address Correction Service notices in the test year?

b. Please provide any and all studies and data related to the implementation of PARS for flats and its effects on the test year costs of Address Correction Service.