

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE
ASSOCIATION FOR POSTAL COMMERCE AND THE MAILING AND FULFILLMENT
SERVICE ASSOCIATION, REDIRECTED FROM WITNESS CUTTING
(POSTCOM/USPS-T26-1b)

The United States Postal Service hereby files its response to the above-listed interrogatory part, filed on July 14, 2006 and redirected from Witness Cutting.

The interrogatory is stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

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ASSOCIATION FOR POSTAL COMMERCE AND THE MAILING AND FULFILLMENT
SERVICE ASSOCIATION REDIRECTED FROM WITNESS CUTTING

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.

RESPONSE:

- b. No such studies or data exist.

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.

Nan K. McKenzie

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