

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

NOTICE OF THE UNITED STATES POSTAL SERVICE
OF FILING REVISED RESPONSE TO INTERROGATORY OF PITNEY BOWES INC.,
REDIRECTED FROM WITNESS ABDIRAHMAN
(PB/USPS-T22-11) [Errata]
(August 2, 2006)

The United States Postal Service hereby provides notice of the filing of a revised institutional response to Pitney Bowes interrogatory PB/USPS-T32-11, originally filed on July 21, 2006, and redirected from witness Abdirahman. The revised response eliminates an extraneous "of" in the first sentence of the response and adds a verb to a sentence later in the response; the inserted verb is emboldened. This revised response completely replaces the original.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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REVISED INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF PITNEY BOWES INC.,
REDIRECTED FROM WITNESS TAUFIQUE

PB/USPS-T32-64. Has the Postal Service undertaken any studies to assess the cost savings or cost avoidances to the Postal Service, potential rates or rate designs, or the impacts to mailers including any changes in their behavior from providing destination entry discounts or zoned rates for Presorted First-Class Mail. If it has, please provide any documents or studies created or undertaken on behalf of the Postal Service regarding destination entry discounts or zoned rates for Presorted First-Class Mail.

RESPONSE:

Only one such study exists: "First-Class Mail Destination-Entry Quantitative Market Research Study" for which only a Draft Final Report was prepared in November 1999.

The purpose of the study was to determine mail depositor reaction to two possible worksharing discounts for discounted First-Class Mail entered at its Destination Sectional Center Facility (DSCF). The study asked mailers for their expected 1999 volume, and the percentage that would be DSCF entered assuming either of two discounts. The complete Draft Final Report is being filed as library reference USPS-LR-L-157, together with summaries of qualitative interviews with twenty respondents. The qualitative study entailed interviews in which mailer-specific reactions to the proposed discounts, including level of interest, impact upon entry time, volume impact, impact on mail production, perceived benefits to customers, billing practices, and other topics **were addressed**. Consideration of the sensitivity of the qualitative summaries of interviews delayed the filing of these responses, especially since respondents were specifically promised confidentiality and there was some question whether respondent identities could be discerned from the material. Postal Service review of the quantitative and qualitative information, however, led to the conclusion that no competitive harm will result from providing access to the Draft Final Report or Interview Summaries; accordingly, all responsive material is being provided.