

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 SMITH TO
INTERROGATORIES OF GREETING CARD ASSOCIATION (GCA/USPS-T13-1-2)
(May 31, 2006)

The United States Postal Service hereby provides the responses of Witness Smith (USPS-T-13) to the following interrogatories of the Greeting Card Association: GCA/USPS-T13-1-2, filed on May 17, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF POSTAL SERVICE WITNESS MARC A. SMITH TO
INTERROGATORY OF THE GREETING CARD ASSOCIATION
GCA/USPS-T13-1**

GCA/USPS-T13-1. Please refer to Part IV and Attachment 14 of your prefiled testimony. Please explain how you have defined the terms "letter," "card," and "flat" as you use them in developing Test Year mail processing unit costs by shape for single-piece First Class Mail.

RESPONSE:

I rely on the shape definitions employed in the volume and cost systems from which I draw my data. The shape definitions for the LR-L-87 RPW volumes by shape for First-Class single piece mail are provided in Docket No. R2005-1, LR-K-22, *Data Collection User's Guide for Revenue, Volume and Performance Measurement Systems*, Handbook F-75, pages 3-67, 3-68, and 3-187 to 3-189. The shape definitions for the In-Office Cost System (IOCS) are provided in LR-L-21, *Data Collection User's Guide for In-Office Cost System*, Handbook F-45, pages 8-5 to 8-8.

**RESPONSE OF POSTAL SERVICE WITNESS MARC A. SMITH TO
INTERROGATORY OF THE GREETING CARD ASSOCIATION
GCA/USPS-T13-2**

GCA/USPS-T13-2 In your analysis of Test Year mail processing unit costs by shape, as reflected in Attachment 14, would a single-piece First-Class letter which (i) weighs one ounce or less, and (ii) is less than 11.5 in. by 6.125 in. by 0.25 in. thick, but (iii) has an aspect ratio less than 1:1.3 or greater than 1:2.5 be counted as a "letter" or as a "flat"? Please explain your answer fully.

RESPONSE:

I assume that by (ii) you mean to describe a piece that does not exceed the size limits for the letter shape definition. Given this interpretation of the question it is my understanding that such a piece would be considered a letter in both the In-Office Cost System (IOCS) and in the LR-L-87 RPW volumes by shape. So such a piece would be counted as a letter.

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.

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