

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 WITNESS KELLEY
(USPS-T-30) TO INTERROGATORY OF ADVO (ADVO/USPS-T30-1)
(July 28, 2006)

The United States Postal Service hereby provides the response of witness Kelley to the following interrogatory of Advo, filed on July 14, 2006: Advo/USPS-T30-1.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

**Response of Postal Service Witness Kelley to Interrogatories
Posed by ADVO, Inc**

ADVO/USPS-T30-1.

In response to NAA-T30-7(e), you provide disaggregated TY08 delivery costs for all three density levels of ECR flat mail. Please provide the electronic version of the complete set of workpapers used to develop those costs. If not already included in those workpapers, please also disaggregate the delivery costs for ECR letter and parcel mail into the three density levels.

Response

Refer to the attached workbook. It is supposed to be self-contained – not having any external links to other workbooks. The source for the vast majority of the data is USPS-LR-L-67. However, originating and carrier volumes for ECR Basic and ECR High Density mail are not included as part of USPS-LR-L-67, since they were not needed to derive the USPS version of delivery costs. Those volumes come from library references USPS-LR-L-11 (city), USPS-LR-L-12 (rural), and USPS-LR-L-87 (RPW by shape). Each worksheet indicates the various sources of the data in column A at the bottom.

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.

Eric P. Koetting

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