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POSTAL BATE COMMISSION OFFICE OF THE SECRETARY

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

Experimental Rate and Service
Changes To Implement Negotiated
Service Agreement With Capital One
Services, Inc.

Docket No. MC2002-2

AMERICAN BANKERS ASSOCIATION
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL WITNESS CHARLES L. CRUM (USPS T3) ABA/USPS
(T3-1)

(November 13, 2002)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the American Bankers Association hereby submits this interrogatory and request for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

<u>ABA/USPS-T-3-1</u>. In your response to interrogatory OCA/USPS-T3-7, you confirm that the weighted cost per piece for physical returns is \$0.5347.

- (a) What is the corresponding cost per piece for mail that is forwarded?
- (b) Identify and to the extent possible quantify all mail piece characteristics, e.g,

weight, presortation, prebarcoding, shape, etc., which affect the cost per piece of (a) forwarding or (b) physically returning mail.

(c) How are these costs affected by these characteristics, e.g., how much more does it cost to both (a) forward or (b) return a two-ounce letter compared to a one-ounce letter.

Respectfully submitted,

Irving 💋. Warden

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CERTIFICATE OF SERVICE

I hereby certify that I have this date caused the foregoing document to be served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Irvirlg D. Warden

November 13, 2002