

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS KAREN MEEHAN (OCA/USPS-T9-2)  
(April 29, 2005)

The United States Postal Service hereby provides its response to the following  
interrogatory of the Office of the Consumer Advocate, filed on April 19, 2005, and  
redirected from witness Karen Meehan (USPS-T-9):

OCA/USPS-T9-2

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, Fax -5402

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INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS KAREN MEEHAN (USPS-T-9)

**OCA/USPS-T-9-2.** The following refers to USPS-LR-K-5, Workpaper B, file "I\_Forms.xls, spreadsheet "I-CS 6&7 FACTORS NEW." Please cite your source for the value identified as "Express Mail Signature Proportion" found on line 72, column B. If the value is the result of a calculation, provide the derivation of all values, cite all sources relied upon and, if source documents have not been previously filed in this docket, please provide a copy.

**Response:**

The input to USPS-LR-K-5, Workpaper B, shown in the input file, I\_Forms.xls, spreadsheet, "I-CS 6&7 FACTORS NEW" cell C72, is 1.00. Its source is D042 ¶1.7 of the Domestic Mail Manual, simply showing that Express Mail is delivered in accordance with the same rules as for an Accountable and signatures are attempted for them. The cell in question, as well as the entire row of line 72, is not needed for the 2004 Base Year, in that it simply multiplies calculations by 1. In the interest of time, and to avoid the potential errors that might have resulted by removing it, it was not deleted from the input file.

## 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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Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, FAX: -5402  
April 29, 2005  
Brian.M.Reimer@usps.gov