

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS WILLIAM P. TAYMAN, JR. (OCA/USPS-T6-11)
(May 3, 2005)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and a request for production of documents. Instructions included with OCA interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T6-11. The following interrogatory refers to Appendix A and Exhibit USPS-60 of your testimony as well as USPS-LR-K-50, page 315.

- a. Please confirm that a portion of the \$3.1 billion (\$3,081.016 million) escrow payment scheduled for FY 2006 and required by Public Law 108-18 relates to the requirement to fund postal employees and retirees CSRS benefits earned through military service.
- b. If you are unable to confirm part a of this interrogatory, please explain fully.
- c. If you confirm part a of this interrogatory, please explain how much of the \$3.1 billion escrow payment relates to:
 - (i) CSRS benefits earned through military service, and
 - (ii) CSRS benefits not earned through military service.
- d. For parts c(i) and c(ii) of this interrogatory, please show the derivation of all calculated values, cite all source documents and provide copies of source documents not previously provided in this docket. Please state any assumptions made in preparing page 315 of LR-K-50 or responding to part c of this interrogatory.