

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

Postal Rate Commission
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POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
(INSTITUTIONAL) (ABA&NAPM/USPS-1)
(May 11, 2005)

Pursuant to sections 26 and 27 of the Postal Rate Commission rules of practice, American Bankers Association and National Association of Presort Mailers hereby submit these joint interrogatories and document production requests.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The respondent should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

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May 11, 2005
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ABA&NAPM/USPS-1.

A number of testimonies appear to rely on forecasts of certain economic variables made by Global Insight, including USPS-T-7 (Thress), USPS-T-8 (Bernstein), and USPS-T-10 (Waterbury).

- a. Please identify: (i) each piece of testimony submitted by the United States Postal Service in this proceeding that relies upon or reflects economic forecasts made by Global Insight; (ii) each witness providing testimony submitted by the United States Postal Service who (a) received or (b) had access to economic forecasts by Global Insight.
- b. With respect to each testimony submitted by the United States Postal Service in this proceeding that relies upon, reflects or was influenced by forecasts made by Global Insight state: (i) What Global Insight forecasts were available to the USPS witness, (ii) the workpaper(s) or library reference in which the data produced by Global Insight is set forth and the place (e.g., page number or spread sheet and cell number(s)) where the data provided by Global Insight is located in each workpaper or Library Reference, and (iii) the date on which such data was produced by Global Insight.
- c. Please provide all the forecasts made by Global Insight since those used in the USPS rate filing for this case for each of the specific variables used in a testimony, workpaper or library reference.
- d. Did any witness rely on, consult, or read any other forecasts other than those made by Global Insight in the preparation of the USPS case? If not, why not? If so, please list the forecasting service, the forecasting variables at issue, and the date(s) of such forecasts together with the values of each variable.