

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
WITNESS JOHN KELLEY (ABA&NAPM/USPS-T16-1-4)
(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 necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

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 witness 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
Washington, D.C.

ABA&NAPM/USPS-T16-1. In LR-K-48, page 1 “First - Class Mail Presort Letters Summary”, please explain why worksharing related delivery costs are lower for non-automation BMM than for automation mixed AADC letters and AADC letters.

ABA&NAPM/USPS-T16-2.

- a. In LR-K-67, Table 1: Test Year FY06 Unit Delivery Costs, please explain why there is no category for BMM.
- b. Please explain why single piece unit delivery costs are lower than nonmachinable categories of nonautomation presort mail.
- c. What percentage of single piece mail is nonmachinable? Please provide a break down of single piece mail unit delivery costs by machinable and nonmachinable volumes.

ABA&NAPM/USPS-T16-3. For Table 1 in LR-K-67, please provide, or provide the detailed roadmap to, all unit delivery costs by rate category by detailed MODS or other cost system. By “detailed” is meant the finest level of disaggregation that exists in your cost finding systems, e.g. 3 digit MODS categories and finer level of detail, whether it exists internally at USPS or with any outside consultant or contractor that creates or manages such data for you. For each such cost category, please provide a clear, written description of what that activity entails, or provide a roadmap to where in your filings or USPS documents such definitions exist.

ABA&NAPM/USPS-T16-4. What assumptions, if any, were made for the test year unit delivery costs insofar as the deployment of DIOSS machines that are replacing MLOCR machines? If no activities on the DIOSS technology are considered delivery costs, please so state.