

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 POSTAL SERVICE WITNESS KELLEY
TO INTERROGATORY OF VALPAK (VP/USPS-T16-1),
(May 12, 2005)

The United States Postal Service hereby provides the response of witness Kelley to the following interrogatories of ValPak, filed on April 28, 2005: VP/USPS-T16-1.

Each 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

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402
May 12, 2005

Response of Postal Service Witness John Kelley to Interrogatories Posed by
Valpak Dealer's Association, Inc.

VP/USPS-T16-1.

Please refer to library reference USPS-LR-J-117, Docket No. R2001-1, which provides cost information underlying the current rates, the relative levels of which would be perpetuated by the across-the-board proposal in this case. Please refer also to library reference USPS-LRK-101, which is a **current** version of the same analysis, at PRC costing.

- a. Please confirm that USPS-LR-J-117 is at USPS costing. If you do not confirm, please explain the costing contained therein.
- b. If you do confirm that USPS-LR-J-117 is at USPS costing in part a, please provide a version of LR-J-117 at PRC costing, using the same base year as USPS-LR-J-117. That is, no updating is being requested, just a PRC version that might have been filed, or prepared for filing, during the Docket No. R2001-1.

Response

- a. Confirmed.
- b. Please refer to Docket 2001-1/PRC-LR-7 for a version of LR-J-117 utilizing PRC costing methods.

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.

Eric P. Koetting

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