

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 UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-T2-1)
(May 27, 2005)

The United States Postal Service hereby files the response of witness Shaw to interrogatory MMA/USPS-T2-1 of Major Mailers Association, filed on May 13, 2005.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083, FAX -3084

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION

MMA/USPS-T2-1 In response to interrogatory MMA/USPS-T16-6, USPS witness Kelly indicates that IOCS data relied upon by USPS witness Schenk in R2001-1 to separately allocate segment 6 costs according to indicia paid is no longer being produced.

- a. Please explain exactly why the Postal Service decided to modify the IOCS in order to stop collecting such data in the form it was collected prior to R2001-1. Please provide all documents and any other information that refers to the Postal Service's decision to stop producing this IOCS data.
- b. Please indicate how difficult it would be to produce such data (1) for this rate case and (2) for a future rate case.

RESPONSE:

- a-b. Please see witness Kelley's revised response to MMA/USPS-T16-6. His revised response appears to make these questions no longer applicable.