

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 LEWIS
TO INTERROGATORY OF VALPAK (VP/USPS-T14-7.b),
REDIRECTED FROM WITNESS BRADLEY
(June 2, 2005)

The United States Postal Service hereby provides the response of witness Lewis to the following interrogatory of ValPak, filed on May 19, 2005: VP/USPS-T14-7.b, redirected from witness Bradley.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 2, 2005

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LEWIS TO
VALPAK INTERROGATORY REDIRECTED FROM WITNESS BRADLEY

VP/USPS-T14-7.

Section I.A of your testimony, at pages 1-2, criticizes the datedness of the data underlying the established model, and concludes by stating that “more recent data would be preferable” (p. 2, l. 21). Then, at page 59 (ll. 11-14), Step 2 of your procedure for estimating the amount of cased ECR Saturation mail relies on data from a study by witness Shipe presented in Docket No. R90-1.

- b. Would you agree that carrier casing productivities may have changed with widespread adoption of vertical flats cases by city carriers? If not, please explain why not.

Response

B. Yes, I agree that carrier casing productivities may have changed with the widespread adoption of vertical flats cases by city carriers. Witness Shipe's R90-1 testimony articulates the expected effect of vertical flats casing.

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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