

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
ADDITIONAL INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN (ABA&NAPM/USPS-T21-55)
(June 8, 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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ABA/NAPM-T21-25 Please refer to Table 3 at page 19 of your testimony as revised 05/24/05, and to the "Total Mail Processing Unit Costs" and "Worksharing Related Savings" set forth there for the FCLM

automated rate categories, using PRC LR-K 110 (Commission Methodology), as revised 05/24/05, cost results. Please confirm that had you used delivery unit costs of all First Class Mail Nonautomation Presort Letters as the proxy for delivery unit costs of the benchmark, Metered Letters, as the Commission did in the last non-settled rate case (R-2000-1), the "Worksharing Related Savings" shown in the above-referenced Table 3 (using revised LR -K-110 cost results), and in Column 5 of the LR-K-110 Letters Summary (revised 05/24/05) for each of the FCLM automated rate categories would be 2.514 cents higher, resulting in the following "Worksharing Related Savings" using PRC LR-K-110 (revised 05/24/05) cost results:

FCLM Automation Mixed AADC Letters 8.645 cents

FCLM Automation AADC Letters 9.744 cents

FCLM Automation 3-Digit Letters 10.155 cents

FCLM Automation 5-Digit Letters 11.480 cents