

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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-T21-56-62)

(June 10, 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/USPS-T21-63

Please confirm that:

- a. Both Mixed AADC and AADC letter mail are residual categories --i.e., they both consist of letters with an 11-Digit POSTNET barcode that are not included in trays of either 3-Digit or 5-Digit letters because the mailer or presorter does not have enough pieces (150) to make up a 3-Digit tray in the case of AADC mail or a AADC tray in the case of a Mixed AADC mail.
- b. A mailer cannot enter Mixed AADC letter mail or AADC letter mail at the rates available for First-Class Automation Mixed AADC letters or First-Class Automation AADC letters without sorting out and submitting all possible trays of 3-Digit First-Class Automation letter mail.
- c. Both Mixed AADC and AADC mail is presented to the Postal Service in letter trays that are labeled, sleeved and banded.
- d. A tray of AADC mail deposited at a USPS facility with a Business Mail Entry Unit, normally a P&DC, is cross-docked and transported to the designated area distribution center ("ADC").
- e. A tray of 3-Digit First-Class letter mail deposited at a USPS facility with a Business Mail Entry Unit, normally a P&DC, is cross-docked and transported to the facility designated by first 3 digits of the POSTNET barcode.
- f. Upon entry at the originating P&DC or General Mail facility, trays of Mixed AADC letters must be taken into the facility, have the band securing the sleeve over the tray and the sleeve removed, be removed from the tray, sorted, put back in a tray that must be labeled, sleeved, banded, and moved back to the loading dock.
- g. A tray of 3-Digit letters, upon arriving at the same facility would only have to be cross-docked onto transportation to the designated 3-Digit facility.
- h. A tray of AADC letters, like a tray of 3-Digit letters, normally will not be sorted at the outgoing facility.
- i. A tray of AADC letter will, upon arrival at a the designated ADC have to be taken into the ADC facility, have the band securing the sleeve and the sleeve removed, be sorted and put in a 3-Digit or 5-Digit letter tray, which will then have to be labeled, sleeved, banded and move back to the loading dock except for any mail that is addressed for delivery in a location for which further sorting is performed in the same ADC facility in which case the tray would have to be moved to the location in the facility where letter mail for such 3-Digit areas is sorted.

j. A 3-Digit letter tray of mail would not be subjected to a sorting at the ADC unless the ADC also happened to be the location at which mail for the 3-Digit location was sorted in which case it could be moved directly to the staging area for sorting of such mail.

k. In some cases, AADC letters, after being sorted at an ADC must be sent on to another facility to which a 3-Digit letter tray would have been sent directly from the originating postal facility.

l. Mail in 3-Digit trays frequently avoids being sent to an intermediate ADC from which it will have to be taken to another point to which a 3-Digit tray of letters could and would have been sent directly by the originating outgoing facility..

ABA&NAPM/USPS-T21-64

If the description of the process for processing Mixed AADC letter mail and/or AADC mail outlined in Interrogatory ABA&NAPM/USPS-T21-63 above is incorrect, please provide a correct description of the process the USPS employs in handling Mixed AADC, AADC and/or 3-Digit trays of letter mail.