

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

Postal Rate and Fee Changes)

Docket No. R2005-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS ABDIRAHMAN (APWU/USPS T-21-1-8)
(June 10, 2005)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS Witness Abdirahman. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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CERTIFICATION

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice.

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June 10, 2005

APWU/USPS-T-21-1 In your response to POIR 1, you discuss the difficulties with properly identifying costs associated with First Class nonautomation presort mail. Is there a similar problem inherent in identifying the costs for nonautomation presort Standard A mail?

APWU/USPS-T-21-2 If the same type of cost identification problems do exist, would that explain the large increase in unit mail processing costs for Basic presort and 3/5-digit presort when compared with the similar costs calculated in R2001-1? Was this identification problem also present in the cost allocations for Standard A letters in R2001-1?

APWU/USPS-T-21-3 To clarify your response to POIR 1, the difficulties with identifying the costs associated with First Class nonautomation presort mail is an issue of correctly separating the costs for nonautomated presort mail from those of automated presort mail?

APWU/USPS-T-21-4 Please confirm that the CRA data for Bulk Metered Mail Letters used in the calculation of workshare savings for First Class mail, is actually for all First Class nonworkshare letter-shaped mail with meter indicia.

APWU/USPS-T-21-5 Is it correct to state that, for purposes of determining mail processing operations and mail processing cost characteristics, it is appropriate to distinguish between BMM letters and all other metered mail letters that do not have BMM characteristics?

APWU/USPS-T-21-6 For metered mail letters other than Bulk Metered Mail (BMM) letters, please list and describe the mail processing operations through which it would pass that are not included in the operations through which BMM letters are assumed to pass in the Postal Service model, and state the per piece costs of each of these additional operations through which metered mail letters other than BMM letters pass.

APWU/USPS-T-21-7 Please confirm that, in concept, the BMM letter benchmark is a subset of all the metered mail letters.

APWU/USPS-T-21-8 Please describe the characteristics of the mail that underlie the processing steps modeled in the BMM letters model.