

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 TAUFIQUE TO INTERROGATORY
OF MAJOR MAILERS ASSOCIATION,
REDIRECTED FROM WITNESS ABDIRAHMAN
(MMA/USPS-T21-55(A-B))

The United States Postal Service hereby files the response of witness Taufique to interrogatory MMA/USPS-T21-55(a-b), filed by the Major Mailers Association on May 18, 2005, and redirected from witness Abdirahman.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION,
REDIRECTED FROM WITNESS ABDIRAHMAN

MMA/USPS-T21-55

Please refer to your response to Interrogatory MMA/USPS-T21-12, which sought information regarding your knowledge of specific enumerated workshare activities performed by a High Volume (HV) First-Class workshare mailer (defined as a mailer that mails on its own behalf and/or on behalf of other First-Class mailers at least 5 million pieces per month). In your response, you state "I am not an expert on how HV workshare mailers perform their internal mail preparation operations, nor is it necessary for me to understand the mailer's [sic] Activities."

- A. Please explain how you can possibly provide accurate estimates of postal cost savings due to worksharing if you do not understand nor are you familiar with the specific requirements, in addition to those listed in postal regulations, that comprise worksharing?
- B. Please explain your view of how changes in technology have changed the nature and extent of mailer worksharing over the past ten years.

RESPONSE:

- A. To capture the savings associated with workshare mail, that mail must be presented in compliance with postal requirements. However, different customers may use different methods to meet the requirements. Consequently Postal Service analysts may not know all the specific mail preparation activities that high volume or other mailers undertake to meet postal requirements. But our analysts are well aware of how mail qualifying for specific rates is presented to the Postal Service and its implication on Postal Service operations.
- B. Mail processing technology both within and outside the Postal Service has changed tremendously over the last few years. The role of technology combined with rate incentives has led to increased worksharing in all classes of mail.