

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 **ERRATA TO RENUMBER**  
INTERROGATORY AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS ABDULKADIR M. ABDIRAHMAN (ABA&NAPM/USPS-T21-64) AS  
(ABA&NAPM/USPS-T21-65)  
(June 23, 2005)

American Bankers Association and National Association of Presort Mailers hereby file this ERRATA to renumber interrogatory "ABA&NAPM/USPS-T21-64" as "ABA&NAPM/USPS-T21-65." On June 10, 2005 ABA and NAPM filed this interrogatory (**PRC filing ID # 44836**) using the incorrect number T21-64. In fact it should have been T21-65; and we have corrected that on the attached Errata interrogatory ABA&NAPM/USPS-T21-65.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION  
NATIONAL ASSOCIATION OF PRESORT MAILERS

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REVISED JUNE 23, 2005

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 INTERROGATORY AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS ABDULKADIR M. ABDIRAHMAN (ABA&NAPM/USPS-T21-65)  
**(RENUMBERED FROM FORMER T21-64)**  
(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  
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**REVISED JUNE 23, 2005**

**ABA&NAPM/USPS-T21-65**

In ABA&NAPM/USPS-T21-20 You were asked in Parts b and c to create two columns comparing operation code by operation code each MODS and NON MODS cost pool for the Automation 3-Digit First –Class letters and Standard A 3-Digit Regular letter. You did not do so. Please do so now. You were also asked in part c. if the differences noted in b. between the two mail categories did not explain the difference in passthroughs noted, then what does, but you did not do so. Please do so now.