

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
ABDIRAHMAN TO INTERROGATORY OF PITNEY BOWES, INC.
(PB/USPS-T21-11)

The United States Postal Service hereby files the response of witness
Abdirahman to the above-listed interrogatory of Pitney Bowes, Inc., which was filed on
June 14, 2005.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

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June 24, 2005

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN
TO INTERROGATORY OF PITNEY BOWES, INC.**

PB/USPS-T21-11. Please refer to your response to PB/USPS-T21-1 subpart h where you partially confirmed that cost pool NONMODS ALLIED contains costs for allied labor activities that include platform and collection activities, moving mail to/from other operations, and separating/breaking down mail and you refer to your response to POIR No. 4, Question 11 (a) which indicates that this cost pool “contains the costs related to platform operations.”

(a) Please confirm that witness Miller’s response to POIR No. 4, Question 11 (b) states that the “costs mapped to [the NONMODS ALLIED] cost pool represent various allied operations performed at non-MODS sites.” If you do not confirm, please explain.

(b) Please confirm that USPS-LR-K-1 page 3-11 indicates that the allied cost pool for non-MODS facilities contains clerk and mail handler costs involved in “[p]latform and collection activities, moving mail to/from other operations, separating/breaking down mail, [and] other allied labor activities.” If you do not confirm, please explain.

(c) Please discuss if the NONMODS ALLIED cost pool contains costs only related to platform operations or if it also contains costs related to other allied operations such as moving mail to/from other operations and separating/breaking down mail. If the NONMODS ALLIED cost pool does not contain costs related to other allied operations at non-MODS facilities, please indicate which cost pool does.

Response:

(a) Confirmed.

(b) Confirmed.

(c) Please see my response to part b.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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