

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

RESPONSES OF POSTAL SERVICE WITNESS SMITH
TO INTERROGATORY OF ABA&NAPM,
REDIRECTED FROM WITNESS ABDIRAHMAN
[ABA&NAPM/USPS-T21-59.a]
(June 28, 2005)

The United States Postal Service hereby provides the response of witness Smith to the above-listed interrogatory of American Bankers Association and National Association of Presort Mailers, filed on June 9, 2005.

The interrogatories are stated verbatim and are followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSES OF POSTAL SERVICE WITNESS SMITH
TO INTERROGATORY OF ABA&NAPM,
REDIRECTED FROM WITNESS ABDIRAHMAN**

ABA&NAPM/USPS-T21-59

In your answer to ABA&NAPM/USPS-T21-22, you state “Also, my understanding is that mail processing and delivery costs are not provided at the 3-digit operational level.”

- a. What do you mean by “3-digit operational level”? What was referenced in the question was the operation codes for MODS cost pools which are identified with 3 numbers in front of the operation name. With this clarification, please answer the question.
- b. Please confirm that in your answer to a., where you state you are using “the cost pools for metered mail”, that in fact you are using a “First Class single piece metered letters” unit cost measurement, which label appears explicitly in row 47 of USPS Witness Smith’s TY2006 spread sheets in LR-K-53, page VI-, 4 of 4.
- c. With respect to your answer to b.-d., the questions are perfectly clear, and the references to two library references do not answer the questions. Please state whose responsibility it is, or was as the USPS witness in this case, to reclassify cost pools, for example, from worksharing related proportional to worksharing related fixed, or worksharing related fixed to nonworksharing related. If that was your responsibility, as it was USPS witness Miller’s in R2000-1 and R2001-1, please answer the questions. If it was not your responsibility, please redirect this question and have that witness answer the questions.

Response:

- a. The cross walk of the mail processing cost pools from R2001-1 to R2005-1 can be done using USPS-LR-J-55, part 1 and USPS-LR-K-55, part 1, as well as witness Van-Ty-Smith’s testimony, USPS-T-11, pages 4-7. See also my responses to: ABA/USPS-T21- 30, 33, 35, 36, 50-53, and ABA&NAPM-USPS-T13-7.

With regard to delivery costs, please see the testimonies of witnesses Bradley, USPS-T-14, and Kelley, USPS-T-16, for information on this.

- b.-c. Retained by witness Abdirahman.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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