

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

FOLLOW-UP INTERROGATORY OF THE UNITED STATES POSTAL SERVICE  
TO VALPAK WITNESS JOHN HALDI  
(USPS/VP-T2-6)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby directs the following follow-up interrogatory to Valpak witness John Haldi: USPS/VP-T2-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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(202) 268-2992, Fax -5402  
August 11, 2005

**USPS/VP-T2-6.** Please refer to your response to Advo/VP-T2-2, and the attachments to that response filed on August 8. Specifically, please refer to the portion of your response to subpart c, in which you state:

As Attachment 1 clearly shows, the total combined volume of letters and DALs delivered by city and rural carriers, 6.795 billion in cell F12, reflects exactly the volume of DALs as estimated by the Postal Service in USPS-LR-K-67 – nothing more, and nothing less. That is, the totals in column F are not any kind of control total derived from RPW (or any other reliable independent source), and using them in this manner, as your question does, is therefore totally inappropriate.

a. Using the cell references within your Attachment 1 for simplicity, please confirm that the above statements in your response to Advo/VP-T2-2 were premised on your belief that, in developing its analysis, the Postal Service derived cell F9 by starting with cells C9 and D9 and summing them, as opposed to starting with cells F9 and D9 and deriving cell C9 by subtracting cell D9 from cell F9. If not confirmed, please explain in detail your understanding of the relationship and data flows between the values in cells C9, D9, and F9 in the Postal Service's analysis.

b. Using the cell references within your Attachment 1 for simplicity, please confirm that the above statements in your response to Advo/VP-T2-2 were also premised on your belief that, in developing its analysis, the Postal Service derived cell F10 by starting with cells C10 and D10 and summing them, as opposed to starting with cells F10 and D10 and deriving cell C10 by subtracting cell D10 from cell F10. If not confirmed, please explain in detail your

understanding of the relationship and data flows between the values in cells C10, D10, and F10 in the Postal Service's analysis.

c. Please confirm that your replication of the values in Attachment 1 cells C9 and C10 in the same cells in Attachment 2 was premised on the same beliefs as posed in parts a and b above. If not confirmed, please explain why you believed it would be appropriate in Attachment 2 to assume that the estimated number of non-DAL letters in column C would be unaffected by your change (relative to Attachment 1) in the estimated number of DALs in column D.

## **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.

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Eric P. Koetting

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