

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

PARCEL RETURN SERVICE

Docket No. MC2006-1

**REVISED RESPONSE OF POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T2-5) (Errata)**

The United States Postal Service hereby provides the revised response of witness Miller to the following interrogatory of the Office of the Consumer Advocate, filed on November 3, 2005, and initially responded to on November 17, 2005:

OCA/USPS-T2-5.

The interrogatory is stated verbatim and is followed by the revised response, which should be substituted for the original response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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November 22, 2005

**OCA/USPS-T2-5.** The following refers to your testimony Attachment C, page 2 and USPS witness Eggleston's testimony, Attachment C, page 2, in Docket No. MC2003-2. The variabilities used in witness Eggleston's testimony differ from the variabilities you use in your testimony for: (1) BMC Platform, (2) BMC Other, (3) PSM, (4) SSM, (5) NMO Distribution at BMCs, (6) Platform Non-BMC, (7) NMO Distribution at Non-BMCs, and (8) LDC43.

- a. If the variabilities used in your testimony Attachment C, page 2, as listed above, differ from the variabilities utilized in the recent Commission opinion in Docket No. R2005-1, please resubmit all pages of your Attachment C using the same variability values as used by the Commission for the rates recommended in that opinion and include in your response a variability for SPBS that is comparable to the SSB variability used by the Commission in the opinion.
- b. If in response to part a, above, you resubmit page 2 of Attachment C using different variabilities, please update all related Tables, Attachments and workpapers impacted by the change in your testimony in this docket.

**RESPONSE:**

(a)-(b) The Postal Service is developing a PRS cost model that relies on the data contained in Docket No. R2005-1, PRC-LR-9. The cost model will be filed once it is completed.

## **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.

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