

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PITNEY BOWES INTERROGATORIES REDIRECTED FROM WITNESS SHAH
(PB/USPS-T1-9 THROUGH 11)
(May 8, 2006)

The United States Postal Service hereby submits the responses of witness Shah to the following interrogatories of Pitney Bowes, filed on April 19, 2006: PB/USPS-T1-9 through 11. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF PITNEY BOWES
REDIRECTED FROM WITNESS SHAH**

PB/USPS T1-9 Please confirm that First-Class Mail presort letters entered by mailers at the facility where they will be delivery point sequenced do not incur any distance-related surface transportation costs by the Postal Service. If not confirmed, please explain fully and provide your best estimate of the proportion of distance-related transportation costs by the Postal Service that would be incurred by these letters.

RESPONSE:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF PITNEY BOWES
REDIRECTED FROM WITNESS SHAH**

PB/USPS T1-10 Please confirm that First -Class Mail presort letters entered by mailers at the facility where they will be delivery point sequenced will not incur any air transportation costs by the Postal Service. If not confirmed, please explain fully and provide your best estimate of the proportion of air transportation costs by the Postal Service that would be incurred by these letters.

RESPONSE:

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF PITNEY BOWES
REDIRECTED FROM WITNESS SHAH**

PB/USPS T1-11 Do First-Class Mail presort letters that are entered at the facility where they will be delivery point sequenced incur a smaller amount of non-distance related surface transportation costs by the Postal Service than other First-Class Mail presort letters? If so, please explain why.

RESPONSE:

No.