

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
TO USPS WITNESS SMITH
(ABA-NAPM/USPS-T13-1)
(June 14, 2006)

Pursuant to sections 25, 26 and 27 of the Commission's rules of practice, the American Bankers Association and the National Association of Presort Mailers direct the following interrogatories to United States Postal Service witness Marc A. Smith (USPS-T-13). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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ABA-NAPM/USPS-T-13-1. In the PRC version of your mail processing cost pool spread sheet, you have provided FY2005 base year unit costs by cost pool and calculated total. See LR-L-99, file shp05prc.xls. In the USPS version, however, you have not provided the corresponding table for FY2005 base year unit costs. See LR-L-53. Please provide that table with the same labels for rows as used in your table for TY2008 unit mail processing costs by cost pool and calculated total.