

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

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**Postal Rate and Fee Changes, 2006**

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**Docket No. R2006-1**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS OF PITNEY BOWES INC. TO UNITED STATES  
POSTAL SERVICE WITNESS ABDULKADIR ABDIRAHMAN  
(PB/USPS-T22-1-8)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness Abdulkadir Abdirahman.

Respectfully submitted,

/s/

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Counsel to PITNEY BOWES INC.

DATED: June 19, 2006

**PB/USPS-T22-1.** Please refer to page 13 of your testimony in R2005-1:

- a. Please confirm that the worksharing related savings calculated included delivery unit savings.
- b. Please confirm that the annotation on line 6 of Table 1 on page 16 of your testimony in R2005-1 states “[t]he worksharing related savings include both mail processing and delivery savings.”

**PB/USPS-T22-2.** Please confirm that your method of calculating worksharing related savings in the instant case does not include delivery savings. If you cannot confirm, please provide a detailed explanation of where and how delivery savings are included.

**PB/USPS-T22-3.** Using the same methods as were used in 2005-1, please calculate the delivery unit savings for TY 2008 for each of the First-Class Mail presort levels.

**PB/USPS-T22-4.** Please refer to page 6 of your testimony in the instant case where you state, “[e]ach cost pool is now classified as being proportional or fixed, with the distinction being only to separate the costs for which my model develops estimates (the proportional costs) from the costs which are beyond the scope of my model (fixed costs).”

- a. Please describe and provide any econometric studies which support the concept that the cost pools that you have classified as fixed actually are fixed with respect to presort level.
- b. Please describe and provide any operational studies which support the concept that the cost pools that you have classified as fixed actually are fixed with respect

to presort level. In this description, please be sure to summarize any discussions you may have had with USPS operations personnel which supports the concept that these cost pools actually are fixed with respect to presort level.

- c. Please describe and provide any studies which support the concept that the cost pools that you have classified as fixed actually are fixed with respect to presort level.

**PB/USPS-T22-5.** Please refer to your interrogatory responses to PB/USPS-T21-1 in R2005-1. Please confirm that your responses would be the same if you were asked these interrogatories in this case. If you cannot confirm, please provide a detailed explanation of why and how the responses would be different.

**PB/USPS-T22-6.** Please confirm that you have modeled costs only for piece handling activities as well some package handling activities. Please describe in detail the package handling activities that were modeled. If you cannot confirm, please provide a detailed explanation as to why you cannot confirm.

**PB/USPS-T22-7.** Please confirm that you have not modeled costs for tray sortation or handling costs. If you cannot confirm, please provide a detailed explanation where and how tray sortation and handling costs are modeled.

**PB/USPS-T22-8.** Please confirm that you have not modeled costs for container sortation or handling costs. If you cannot confirm, please provide a detailed explanation where and how container sortation and handling costs are modeled.