

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN TO
INTERROGATORY OF TIME WARNER INC., REDIRECTED FROM WITNESS TAUFIQUE
(TW/USPS-T32-2(a))

The United States Postal Service hereby files the response of Witness Abdirahman to the above-listed interrogatory subpart, filed on June 12, 2006 and redirected from witness Taufique.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 26, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN TO INTERROGATORY OF TIME WARNER, INC., REDIRECTED FROM WITNES TAUFIQUE

TW/USPS-T32-2 Please refer to page 24, line 20, of your testimony, where you reference a cost avoidance for QBRM of 1.52 cents, and to the following observation of the Commission in Docket No. R2005-1 (PRC Op. 2005-1, pp. 121-22, ¶ 6028):

The model used to estimate the mail processing costs avoided by Qualified Business Reply Mail (QBRM) in the current and previous rate cases differs from the method last approved by the Commission. ... [Two differences are discussed.] The validity of these changes should be tested.

- a. Please provide a discussion of all Postal Service reasons for deviating from the cost analysis “last approved by the Commission.”
- b. Please provide the test year cost avoidance that would be implied by the “method last approved by the Commission.”

RESPONSE:

a. In Docket No. R2001-1, the QBRM analysis did not follow the methodology employed in R2000-1 and was revised to follow the methodology originally presented, and approved, in Docket No. R97-1. For discussions of the reasons for those revisions, please refer to Docket No. R2001-1, USPS-T-22, revised on 11/16/01, pages 26-27. This methodology was followed in R2005-1 (see R2005-1, USPS-T-22, revised 6/8/2005 at pages 4 -5) and in my testimony in this case (see R2006-1, USPS-T-22, at page 16).

b. Redirected to the Postal Service

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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