



### THIRD SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE

TW/USPS-5 Please refer to the Postal Service's response to TW/USPS-T32-3, redirected from witness Taufique, in which it is indicated that the Postal Service has not measured the extent of any lower delivery costs of QBRM that might be due to such things as the use of post office boxes, caller service, firm holdouts, bulk delivery, or customer pick-up arrangements.

- a. Aside from those listed in the question above, does the Postal Service know of any other characteristics that QBRM tends to have that would cause it to have lower-than-average costs? If it does, please explain what those characteristics are.
- b. Short of having information on costs, does the Postal Service have any measure or other ways of quantifying the extent to which, relative to other pieces with which it is averaged, QBRM destinates in post office boxes, is received by addresses using caller service, is handled as a firm holdout, is delivered in bulk, or is otherwise picked up by the addressee? If it does, please provide that quantification. If no quantification is available, please provide the Postal Service's best institutional insight on the extent to which these occur.
- c. To the extent that it is not covered in the response to part a of this question, does the Postal Service agree that QBRM quite often does not receive an incoming secondary sort? If so, please provide quantification of the extent to which this is the case.

TW/USPS-6 Please refer to the Postal Service's response to TW/USPS-T32-2(b), redirected from witness Taufique, which states that the cost avoidance for QBRM "implied by the 'method last approved by the Commission' is 3.980 cents."

- a. Please outline the relevant characteristics of the study supporting the result of 3.980 cents and compare them with the characteristics of the study contained in USPS-LR-L-104.
- b. Please provide a copy of the study supporting the result of 3.980 cents.