

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF CONSUMER ADVOCATE
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
WITNESS ALTAF H. TAUFIQUE (OCA/USPS-T32-17-18)
July 5, 2006

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS, Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

901 New York Ave., N.W.
Suite 200
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6891
E-mail: costicher@prc.com

OCA/USPS-T32-17. The existing additional ounce rates for presorted, automation letters and automation flats (\$0.237) differed by \$0.003 from that of single-piece First-Class mail (\$0.24). In light of the previous \$0.003 cent rate difference between First-Class single piece letters and presorted letters, please explain why the proposed difference between the additional ounce rate for Single-Piece letters (\$0.20) and presorted letters (\$0.155) has increased to \$0.045.

OCA/USPS-T32-18. Your testimony at page 4, states: “Historically, the additional ounce rate bore, not only the cost of additional weight, but also recovered the cost caused by differences in shapes. As the Postal Service explicitly recognizes the shape differences in First-Class Mail rates, the additional ounce rate may be reduced as illustrated in the instant request.” The following interrogatories refer to pages 6 and 7 of your testimony.

- a. Please explain why the proposed First-Class automation letter additional ounce rate (\$0.155) is less than the proposed additional ounce rate for First-Class single piece letters (\$0.20).
- b. Please explain why the proposed First-Class automation letter additional ounce rate (\$0.155) is less than the proposed additional ounce rate for First-Class automation flats (\$0.20).
- c. Please explain why the proposed First-Class automation letter additional ounce rate (\$0.155) is less than the proposed additional ounce rate for First-Class mail business parcels (\$0.20).