

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

**POSTAL RATE AND FEE CHANGES, 2006**

**Docket No. R2006-1**

**SECOND SET OF INTERROGATORIES OF  
THE ASSOCIATION FOR POSTAL COMMERCE AND THE  
MAILING AND FULFILLMENT SERVICE ASSOCIATION  
TO USPS WITNESS DREW MITCHUM**

**(POSTCOM/USPS-T40-7-15)**

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing Fulfillment Service Association (herein, collectively "PostCom") direct the attached Second Set of Interrogatories to Witness Drew Mitchum. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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**POSTCOM/USPS-T40-7.** Please describe the method and rationale you used to derive the formula whereby First-Class Mail scans are proposed to be assessed one unit each and Standard Mail scans are proposed to be assessed five units each.

**POSTCOM/USPS-T40-8.** Please provide all data to support the formula whereby First-Class Mail scans are proposed to be assessed one unit each, while Standard Mail scans are proposed to be assessed five units each.

**POSTCOM/USPS-T40-9.** Please provide the number of scan records actually charged for the base year, FY 2005 for:

- a. All mail pieces.
- b. All First-Class Mail pieces.
- c. All Standard Mail pieces.

**POSTCOM/USPS-T40-10.**

- a. Please provide the total number of scan records for each level of subscription (silver, gold, and platinum) for the base year, FY 2005.
- b. Please provide the total number of scan records of First-Class Mail pieces charged for each level of subscription (silver, gold, and platinum) for the base year, FY 2005.
- c. Please provide the total number of scan records of Standard Mail pieces charged for each level of subscription (silver, gold, and platinum) for the base year, FY 2005.

**POSTCOM/USPS-T40-11.** Please refer to USPS-T-40 WP-4. For Test Year 2008, you estimate that after the rates are effective, that there will be 919 units purchased for the 1<sup>st</sup> through 9<sup>th</sup> block of units; 4,265 units purchased for the 10<sup>th</sup> through 89<sup>th</sup> block of units; and 22,868 units purchased for the 90<sup>th</sup> and more block of units.

- a. Please provide the data upon which you relied to derive these estimates by blocks of units.
- b. In calculating estimated volumes for Test Year 2008, please provide your volume estimates for the number of First-Class scans and Standard Mail scans broken down by categories of blocks of units (*i.e.*, 1<sup>st</sup> through 9<sup>th</sup>; 10<sup>th</sup> through 89<sup>th</sup>; and 90<sup>th</sup> and more).

**POSTCOM/USPS-T40-12.** Please provide all data or documents addressing the percentage of scan records provided relative to the percentage of scans charged for the base year, FY 2005.

**POSTCOM/USPS-T40-13.** Please refer to page 16 of your testimony. You propose to that “units” replace “scans” as the “currency” for paying for Confirm<sup>®</sup> service to add flexibility.

- a. Please describe whether “flexibility” would entail altering the formula by which First-Class Mail is assigned one unit and Standard Mail is assigned five units.
- b. Please describe any other type of “flexibility” currently envisioned by the Postal Service.
- c. Does the Postal Service believe that it is required to seek approval of the Postal Rate Commission in order to change the formula ratio?

**POSTCOM/USPS-T40-14.** Please provide a breakdown by volume for Test Year 2008 by Origin Confirm<sup>®</sup> versus Destination Confirm<sup>®</sup>.

**POSTCOM/USPS-T40-15.** Please refer to page 6 of your testimony on Address Correction Service.

- a. Please explain how the Postal Service intends to apply the “additional notice” fee. For example, does the Postal Service intend to charge for the third notice received for the same address in subsequent mailings by the same mailer or does it intend to charge the fee for the third notice in a mailing?
- b. What are the costs associated with compiling the data needed to track and impose “additional notice” fees?