

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 THRESS
TO INTERROGATORY OF MMA (MMA/USPS-T32-3.B),
REDIRECTED FROM WITNESS TAUFIQUE
(July 17, 2006)

The United States Postal Service hereby provides the response of witness Thress to the following interrogatory of MMA, filed on June 28, 2006: MMA/USPS-T32-3.B, redirected from witness Taufique.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 17, 2006

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INTERROGATORY OF MMA, REDIRECTED FROM WITNESS TAUFIQUE**

MMA/USPS-T32-3.

B. Do you agree that, since MC95-1, the demand characteristics for First-Class workshared mail have changed significantly due in part to increased use of the Internet as a viable, less expensive substitute for many paper transactions, including but not limited to invoice presentation, payment remittance, and delivery of financial statements? Please explain your answer.

Response:

B. Please see the discussion on pages 43-52 and 64-73 of my direct testimony (USPS-T-7). Overall, without an awareness of exactly what demand characteristics are being compared, and the context in which the comparison is being suggested, I am not sure whether I would agree that the changes have been what I would term "significant" or not.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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