

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
KIRK KANEER TO INTERROGATORY OF DAVID POPKIN
DBP/USPS-T41-9

The United States Postal Service hereby provides the response of witness Kirk Kaneer to the following interrogatory of David Popkin: DBP/USPS-T41-9, filed on July 13, 2006.

The interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -3084
July 27, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-T41-9 Please refer to your responses to Interrogatories DBP/USPS-T41-2 and 4.

- [a] Please explain the meaning of each of the terms that are listed in the left column of Tables 1 through 3
- [b] Please provide a listing of each of the different levels, ranges, or categories that apply to each of the terms listed in the left-hand column of Tables 1 through 3.
- [c] Please advise how each of the numbers shown in the middle column of Tables 1 through 3 was derived.
- [d] Please advise how each of the numbers shown in the right-hand column of Tables 1 through 3 was derived.
- [e] Please provide an explanation showing what specific numbers were utilized in what specific calculation so as to arrive at the Erents that were shown for the three referenced facilities.

RESPONSE:

- [a] My response to DBP/USPS-T41-2 cited the document that defines the terms listed in the left column, and explains the estimation process in detail.
- [b] The right-hand column provides the value for each term and see the response to part [a] above.
- [c-d] See the responses to parts [a-b], above.
- [e] Each table shows the equation that calculates the Erents. Also see USPS-LR-L-125, Part A, page 2-9.