

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-93-94)  
(August 9, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatories of the Office of the Consumer Advocate, which were filed on July 27, 2006:

OCA/USPS-93-94

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-93.** The following refers to the response to OCA/USPS-23, dated July 24, 2006.

a. Please provide a reconciliation of the Total FY 2005 First- Class volumes by shape and by weight increment provided in the response to OCA/USPS-23a with the volumes provided in USPS-LR-129 worksheets:

- (1) TYBR,
- (2) TYAR,
- (3) Base Year, and
- (4) Vol. FY08BR&FY08AR.

b. Please provide a reconciliation of the FY 2005 First-Class Presort volumes by shape and by weight increment provided in the response to OCA/USPS-23c with the volumes provided in USPS-LR-129 worksheets:

- (1) TYBR,
- (2) TYAR,
- (3) Base Year, and
- (4) Vol. FY08BR&FY08AR.

**RESPONSE:**

a-b The following table below provides a comparison of First-Class BY 05

volumes in LR-L-129 sheets "TYBR", "TYAR", "Base Year" and "Vol.

FY08BR&FY08AR" with the First-Class volumes provided in OCA/USPS-23a.

The volume estimates in the five sources are identical with the exception of the

exclusion of Absentee Ballots in LR-L-129 sheets "Base Year" and "Vol.

FY08BR&FY08AR".

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**RESPONSE TO OCA/USPS-93 (continued)**

**OCA/USPS-93**

**Reconciliation of First-Class Volumes LR-L-129 - OCA/USPS-23**

	LR-L-129				
	OCA/USPS-23a	TYBR	TYAR	Base Year	Vol. FY08BR&FY08AR
Total First Class Letter, Flats and Parcels	92,441,540	92,441,540	92,441,540	92,440,425	92,440,425
Single Piece Excluding Absentee Ballots	43,374,873	43,374,873	43,374,873	43,374,873	43,374,873
Single Piece Absentee Ballots	1,115	1,115	1,115	Not Included	Not Included
Single Piece Letters Excluding Absentee Ballots and QBRM	38,968,943				38,968,943
QBRM Pieces	346,973				346,973
Single Piece Letters Absentee Ballots	1,115				Not Included
Single Piece Flats	3,572,195				3,572,195
Single Piece Parcels	486,762				486,762
Total Single Piece	43,375,988	43,375,988	43,375,988	43,374,873	43,374,873
First Class Presort	49,065,552	49,065,552	49,065,552	49,065,552	49,065,552
First Class Presort Nonautomation Letters	1,739,317				
First Class Presort Nonautomation Flats	176,370				
First Class Presort Nonautomation Parcels	8,394				
First Class Nonautomation Total	1,924,080	1,924,080	1,924,080	1,924,080	1,924,080
First Class Automation Letters	46,408,216	46,408,216	46,408,216	46,408,216	46,408,216
First Class Automation Flats	733,256	733,256	733,256	733,256	733,256
First Class Automation Total	47,141,472	47,141,472	47,141,472	47,141,472	47,141,472

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-94.** The following refers to the response to OCA/USPS-24, dated July 24, 2006.

a. Please provide a reconciliation of the Total FY 2008 First-Class volumes by shape and by weight increment provided in the response to OCA/USPS-24a with the volumes provided in USPS-LR-129 worksheets:

- (1) TYBR and
- (2) Vol. FY08BR&FY08AR.

b. Please provide a reconciliation of the First-Class Presort volumes by shape and by weight increment provided in the response to OCA/USPS-24c with the volumes provided in USPS-LR-129 worksheets:

- (1) TYBR and
- (2) Vol. FY08BR&FY08AR.

**Response**

a-b The table below provides a comparison of the Test Year Before Rates First-Class volume estimates from LR-L-129 sheets "TYBR" and "Vol. FY08BR&FY08AR" and the First-Class volume estimates from OCA/USPS-24. In the development of the LR-L-129 estimates witness Taufique (USPS-T-32) used the disaggregated TY 08 volumes provided by witness Thress for First-Class Automation letters, First-Class Automation flats and First-Class Nonautomation. In the development to the OCA/USPS-24 estimates the BY 05 distribution of First-Class Presort by shape and weight increment was used to distribute total TY 08 First-Class presort volume. Errata are being filed today to the Postal Service's response to OCA/USPS-24, using witness Taufique's methodology. In

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
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**RESPONSE TO OCA/USPS-94 (continued)**

addition to the different levels of aggregation used in LR-L-129 and OCA/USPS-24, the parcel estimates differ as witness Taufique has assumed that all First-Class Nonautomation Parcels migrate and 36 percent of First-Class Single Piece parcels migrate to Business Parcels.

**OCA/USPS-94**  
**Reconciliation of First-Class Volumes LR-L-129 - OCA/USPS-23**

	OCA/USPS-24		TYBR	LR-L-129
	OCA/USPS-24	Revised		Vol. FY08BR&FY08AR
Total First Class Letter, Flats and Parcels	86,549,872	86,549,872	86,549,872	86,549,872
Single Piece Letters	34,590,641	34,590,641		34,590,641
Single Piece Flats	3,142,774	3,142,774		3,142,774
Single Piece Parcels	428,247	428,247		274,078
Total Single Piece	38,161,662	38,161,662	38,161,662	38,007,493
First Class Presort Total	48,388,210	48,388,210	48,388,210	48,542,379
First Class Presort Letters	47,482,864	47,555,620	NA	47,555,620
First Class Presort Flats	897,069	828,296	NA	828,296
First Class Presort Parcels	8,278	4,294	NA	158,463
First Class Presort Nonautomation Letters	NA	889,760	NA	889,760
First Class Presort Nonautomation Flats	NA	90,223	NA	90,223
First Class Presort Nonautomation Parcels	NA	4,294	NA	NA
First Class Nonautomation Total	NA	984,277	984,277	979,983
First Class Automation Letters	NA	46,665,861	46,665,861	46,665,861
First Class Automation Flats	NA	738,072	738,072	738,072
First Class Automation Total	NA	47,403,933	47,403,933	47,403,933
Business Parcels	NA	NA	NA	158,463

## **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.

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August 9, 2006  
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