

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORY OF THE UNITED STATES POSTAL SERVICE TO  
ASSOCIATION FOR POSTAL COMMERCE ET AL. WITNESS PURSLEY  
(USPS/POSTCOM-T2-1)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the above-referenced interrogatory to Association for Postal Commerce et al. witness Pursley.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**USPS/Postcom-T2-1** Please refer to page 7 of your testimony where you discuss your proposal to increase the passthrough for the 5-digit automation flats presort discount to 100%. Please also refer to the Postal Service's proposed percentage increases for Standard Mail Regular shown in witness Kiefer's revised workbook WP-STDREG-R0621.XLS (USPS-LR-L-36), in the worksheets entitled Financial Summary and Percent Rate Changes.

- (a) Is it your understanding that the Postal Service has proposed an increase for 5-digit automation flats that is lower than the subclass average?
- (b) Is it your understanding that the Postal Service has proposed an increase for 3-digit automation flats that is higher than the subclass average?
- (c) Is it your understanding that, all else equal (including holding total revenue generated constant), a higher passthrough of the cost differential between 3-digit and 5-digit automation flats would lead to an even higher increase for 3-digit flats than that proposed by the Postal Service?