

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  
POSTCOM WITNESS CLIFTON B. KNIGHT, JR.  
(USPS/POSTCOM-T7-8)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the above-listed interrogatory to POSTCOM witness Clifton B. Knight, Jr.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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October 3, 2006

USPS/POSTCOM-T7-8.

In Section IV.A. of your testimony concerning Automation Flats, you assume new flats definitions and presort requirements to estimate that "The average unit increase in postage costs for the delivery of these products at the Non-Flat Machinables rate would be approximately 115%." (page 7, lines 11-12) Using the flats definitions and presort requirements that the USPS proposed in the September 27, 2006, Federal Register, please update your estimate.