



**GCA/PB-T1-1** Please consider the following two propositions, which might be asserted of some particular mailer activity:

1. The activity is the lowest-cost option for the mailer.
2. The activity is not one which could be performed by the Postal Service.

Please refer to page 7, lines 506 of your pre-filed testimony. Would the definition proposed there include as “worksharing” –

- a. An activity of which (1) was true?
- b. An activity of which (2) was true?
- c. An activity of which both (1) and (2) are true?

Please explain fully the reasons for your answers.

## **RESPONSE**

- a. As stated on page 7 of my testimony, I set out a broad definition of worksharing as follows, “*worksharing* refers to any private sector *activity* which *reduces the costs* of the Postal Service.” Under this definition, the focus is on whether the activity reduces the costs of the Postal Service regardless of whether the activity is the lowest-cost option for the mailer or whether the activity is one which could be performed by the Postal Service.
- b. Please see (a) above.
- c. Please see (a) above.

**GCA/PB-T1-2** Please refer to page 11, lines 13-15 and 17-19, of your pre-filed testimony. Please supply all documents in your possession presenting, disputing, or otherwise reflecting the Postal Service arguments reported in the two cited passages of your testimony.

**RESPONSE**

I do not have any specific documents presenting, disputing, or otherwise reflecting the Postal Service arguments characterized in my testimony, nor did I rely on any such documents in developing my testimony. These passages reflect my understanding of the Postal Service's position on these issues.

**GCA/PB-T1-3** Please refer to pages 12-13 of your pre-filed testimony.

Please provide any data or estimates in your possession concerning the number of households in the United States which possess a postage meter.

**RESPONSE**

I do not have any data or estimates concerning the number of households in the United States which possess a postage meter, nor did I rely on any such data or estimates in developing my testimony.

**GCA/PB-T1-4** Please refer to page 12, lines 12-16, of your pre-filed testimony.

Is it your opinion that the long lines at retail windows referred to in this passage of your testimony reflect only the purchase of stamps? Please provide the reasons for your answer.

**RESPONSE**

No. Obviously, the Postal Service provides additional services at retail windows.