

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO GRAYHAIR SOFTWARE WITNESS BELLAMY  
(USPS/GHS-T1-15-16)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to GrayHair Software witness Bellamy: USPS/GHS-T1-15 to 16.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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October 6, 2006

**USPS/GHS-T1-15.**

Please refer to your responses to USPS/GHS-T1-3 and USPS/GHS-T1-4.

(a) Please confirm that your estimate in response to USPS/GHS-T1-4(b) assumes that you will be spending an additional \$30,500 (\$80,000 - \$9,500 for Platinum subscription fee increase - \$40,000 which is the amount you spend currently (based on your response to USPS/GHS-T1-4(a)) on additional IDs as a result of the OCA proposal. If you confirm, please explain why you would need twice as many additional IDs under the OCA proposal. If you do not confirm, please explain fully the basis for your estimate of an additional \$30,500 in spending above the Platinum subscription fee increase.

(b) Please provide the full basis for the claim that, under the Postal Service proposal, Confirm service will cost GrayHair \$220,000 or more.

(c) Please reconcile this claim that your costs will increase \$180,000 under the Postal Service proposal, in your response to USPS/GHS-T1-4(c), with your response to USPS/GHS-T1-3(a) and your testimony on page 16, where you state that GrayHair's Confirm fees will increase by at least 460 percent.

**USPS/GHS-T5-16.**

Please refer to your response to USPS/GHS-T1-3(a) in which you claim:

it will be found that the mailer in other classes always seems to have to pay 500% of what the First-Class mailer pays.

Please confirm that this statement is inaccurate as the following table shows. If you do not confirm, explain fully.

Scans	Fee if all FCM	Fee if all SM	SM Fees as a percentage of FCM Fees
100,000	5,000	5,000	100%
200,000	5,000	5,000	100%
1,000,000	5,000	5,280	106%
5,000,000	5,280	6,155	117%
25,000,000	6,155	9,218	150%
100,000,000	8,780	25,653	292%
250,000,000	11,405	28,905	253%
500,000,000	15,780	50,780	322%
1,000,000,000	24,530	94,530	385%