

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO WITNESS
KOBÉ (APWU-T-1) TO MAJOR MAILERS ASSOCIATION INTERROGATORIES
MMA/APWU-T1-32
(October 18, 2006)**

The American Postal Workers Union, AFL-CIO provides the responses of witness Kathryn Kobe to the interrogatories of the Major Mailers Association submitted on October 4, 2006. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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MMA/APWU-T1-32

Please refer to page 15 of your direct testimony where you state, "it seems highly unlikely that the mail that is converting to presort mail is equivalent to the average collection mail that is coming from individual households, nonprofit organizations, and small businesses." Please also refer to your response to MMA/APWU-T1-1 where you indicate that First-Class Presorted volumes increased by 3.7% in FY 2005.

- A. Please confirm that while First-Class Presorted volumes increased in FY 2005, First-Class Single Piece volumes decreased by about 4%. If you cannot confirm, please indicate by how much First-Class Single Piece volumes decreased in FY 2005 and support your answer.
- B. Please confirm that you have not studied the possible shift of letters from First Class Single Piece to Presorted, but that you feel "there probably is some Single Piece mail that is still shifting from one category to the other." See your response to MMA/APWU-T1-1.
- C. Please define precisely what you mean by a "shift" of letters from First-Class Single Piece to Presorted. Do you mean, for example, that letters no longer sent out as First-Class Single Piece are now sent out as First-Class Presorted? If not, please explain precisely what you mean by a "shift" of letters from Single Piece to Presorted.
- D. Please assume that you are a dutiful niece who for years sent monthly letters to your Aunt Minnie. Assume further that all these letters exhibited the cost attributes similar to an "average" First-Class single piece letter. Now, in 2005 you and your Aunt Minnie discovered the Internet and you substituted your 12 monthly letters with 12 monthly emails. Please confirm that, as far as the Postal Service is concerned, those letters are lost to the system and First-Class Single Piece has lost 12 "average" Single Piece letters. If you cannot confirm, please explain.
- E. Please assume that you also enjoy calling your Aunt Minnie as well, and in

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2005 you decided to sign up for a cell phone. The cell phone company sent you 12 monthly bills in 2005, all of which qualified as Automation letters. Please confirm that, as far as the Postal Service is concerned, those letters are new to the system and First-Class Automation has gained 12 pieces that are similar to an “average” Automation letter. If you cannot confirm, please explain.

- F. Please confirm that, as far as the Postal Service is concerned, the 12 “average” Single Piece letters lost and the 12 “average” Automation letters gained represent a “shift” of letters from First-Class Single Piece to Presorted. If you cannot confirm, please explain.

Response:

- A. Confirmed.
- B. Confirmed.
- C. A piece that would have previously been mailed as a Single Piece First Class piece is now mailed as a Presort First Class piece.
- D. The Postal Service would count only the net change in the number of Single Piece letters. While the number would be lower by 12 than it otherwise would have been, the Postal Service has no way of determining that.
- E. The Postal Service would count only the net change in the number of automation letters. While that number would be 12 higher than it would have been without those bills, the Postal Service would have no way of determining that.
- F. Not confirmed. There have been net changes in two sets of numbers. The Postal Service is not going to have perceived a “shift” of 12 letters. Nor is this the definition of a shift defined in C.