

**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 FOLLOW-UP INTERROGATORY OF MAJOR MAILERS
MMA/APWU-T1-33
(October 18, 2006)**

The American Postal Workers Union, AFL-CIO provides the responses of witness Kathryn Kobe to the follow-up interrogatory of the Major Mailers Association submitted on October 16, 2006. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO WITNESS
KATHRYN KOBE TO INTERROGATORY OF MMA

MMA/APWU-T1-33

Please refer to your response to MMA/APWU-T1-28 (b). In that interrogatory you were asked to confirm certain results had you replicated your worksharing cost savings analysis with only one change -- using the Commission's attributable costs rather than the Postal Service's attributable costs. In the event you could not confirm the results, you were asked to provide corrected figures and to show how they were derived. You did provide corrected figures but did not provide the analysis that produced those results. Please provide the Excel file, similar to APWU-LR-1, that produced the specific figures that you provide in answer to MMA/APWU-T1-28 (b).

Response:

The numbers are provided in Library Reference APWU-LR-3, filed October 18, 2006.