

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005 )

Docket No. R2005-1

INTERROGATORIES OF GREETING CARD ASSOCIATION  
TO THE UNITED STATES POSTAL SERVICE  
WITNESS ALTAF H. TAUFIQUE  
(GCA/USPS-T28-1-3)  
(April 28, 2005)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Greeting Card Association (GCA) directs the following interrogatories to the United States Postal Service Witness Taufique.

Respectfully submitted,

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Counsel for  
GREETING CARD ASSOCIATION

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**FIRST SET OF INTERROGATORIES TO WITNESS TAUFIQUE  
(USPS-T-28)**

GCA/USPS-T28-1 Please refer to pages 4-6 and Table 1 of your prepared testimony, USPS-T28. USPS witnesses Potter (USPS-T1, pp 4-5, 7) and Robinson (USPS-T27, pp. 6-8) state the purpose of this case is to raise sufficient additional revenue to discharge the Public Law 108-18 escrow obligation, by means of substantially equal increases for substantially all categories. In view of this purpose, what is the rationale for enlarging the discount for certain First-Class Presorted and Automation heavy pieces? In addition to explaining this rationale, please furnish any documents in which such rationale or the considerations underlying its development are set forth.

GCA/USPS-T28-2 Did the Postal Service estimate the amount of revenue that would be forgone by increasing the heavy-piece discount referred to in Interrogatory GCA/USPS-T28-1? If your answer is not an unqualified "no," please provide such estimate and any and all underlying calculations.

GCA/USPS-T28-3 Did the Postal Service estimate the amount of revenue that would be obtained by raising the non-machinable surcharge for single-piece First-Class Letters from 12 cents to 13 cents? If your answer is not an unqualified "no," please provide such estimate and any and all underlying calculations.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.

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Alan R. Swendiman

April 28, 2005