

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

---

**Postal Rate and Fee Changes, 2005**

---

**Docket No. R2005-1**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS OF PITNEY BOWES INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
ABDULKADIR M. ABDIRAHMAN  
(PB/USPS-T21-10)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness Abdulkadir M. Abdirahman.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
John Longstreth  
Michael F. Scanlon  
PRESTON GATES  
ROUVELAS MEEDS LLP  
1735 New York Avenue, NW  
Suite 500  
Washington, DC 20006  
Telephone: (202) 628-1700  
Facsimile: (202) 331-1024  
E-Mail: [johnl@prestongates.com](mailto:johnl@prestongates.com)  
[mscanlon@prestongates.com](mailto:mscanlon@prestongates.com)

Postal Rate Commission  
Submitted 5/26/2005 3:17 pm  
Filing ID: 44437  
Accepted 5/26/2005

Counsel to PITNEY BOWES INC.

DATED: May 26, 2005

**PB/USPS-T21-10.** Please refer to the attached modified versions of USPS-LR-K-48, LR-K-48FCLTRS-RevisedV4.xls and USPS-LR-K-110, LR-K-110 FCLTRSRevisedV4.xls entitled, respectively, LR-K-48FCLTRS-RevisedV4\_CRA MOD.xls and LR-K-110 FCLTRSRevisedV4\_CRA MOD.xls.

- (a) Please confirm that the modified versions only introduce changes to the three worksheets entitled CRA – Bulk Metered Letters, CRA – Auto Letters, and CRA – Non Auto Letters. If you do not confirm, please explain.
  
- (b) Please confirm that the modifications are highlighted in yellow and allow a user to input a value of 1, 2, or 3 for each cost pool that classifies the cost pool and assigns the cost as either worksharing-related proportional, worksharing-related fixed, or non-worksharing-related fixed. If you do not confirm, please explain.
  
- (c) Please confirm that entering values in the modified worksheets to match the cost pool classifications in revised USPS-LR-K-48 and revised USPS-LR-K-110 computes the same worksharing-related unit cost savings found in revised USPS-LR-K-48 and revised USPS-LR-K-110. If you do not confirm, please explain.
  
- (d) Please confirm that the modified versions compute worksharing-related unit cost savings correctly under any assignment of cost pools to worksharing-related proportional, worksharing-related fixed, or non-worksharing-related fixed. If you do not confirm, please explain.

(e) Please confirm that classifying all cost pools as worksharing-related proportional in LR-K-48FCLTRS-RevisedV4.xls and LR-K-48FCLTRS-RevisedV4\_CRA MOD.xls computes the following selected results. If you do not confirm, please explain.

**RESULTS CLASSIFYING ALL COST POOLS AS  
WORKSHARING-RELATED PROPORTIONAL  
(cents)**

		Total Worksharing- Related Unit Cost	Total Worksharing- Related Unit Cost Savings
1	Bulk Metered Mail	14.835	n/a
2	Automation MAADC Letter	10.110	4.725
3	Automation AADC Letter	8.465	6.370
4	Automation 3-Digit Letter	7.865	6.970
5	Automation 5-Digit Letter	5.875	8.960

(f) Please confirm that classifying all cost pools as worksharing-related proportional in LR-K-110 FCLTRSRevisedV4.xls and LR-K-110 FCLTRSRevisedV4\_CRA MOD.xls computes the following selected results. If you do not confirm, please explain.

**RESULTS CLASSIFYING ALL COST POOLS AS  
WORKSHARING-RELATED PROPORTIONAL  
(cents)**

		Total Worksharing- Related Unit Cost	Total Worksharing- Related Unit Cost Savings
1	Bulk Metered Mail	16.745	n/a
2	Automation MAADC Letter	10.675	6.070
3	Automation AADC Letter	8.940	7.805
4	Automation 3-Digit Letter	8.299	8.446
5	Automation 5-Digit Letter	6.205	10.540