

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

POSTAL RATE AND FEE CHANGES, 2005)

Docket No. R2005-1

AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
ADDITIONAL INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ALTAF H. TAUFIQUE (ABA&NAPM/USPS-T28-1)

(June 10, 2005)

Pursuant to sections 26 and 27 of the Postal Rate Commission rules of practice, American Bankers Association and National Association of Presort Mailers hereby submit these joint interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

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ABA&NAPM/USPS-T28-1

In responding to ABA&NAPM/USPS-T21-20, redirected from USPS witness Abdirahman, you stated that the passthrough of avoided costs for First-Class 3-Digit automation letters is 107 percent. However, the question did not ask what the percentage passthrough of avoided costs is. It asked rather, about the difference in the passthrough percentages for 3-Digit First-Class automation mail and Standard A 3-Digit mail. Please explain the extent to which, using the Commission's incremental approach, the 218% costs avoided passthrough for 3-Digit First-Class automation versus and the 49% costs avoided passthrough for Standard A 3-Digit is a result of using a relatively high cost non-automation presort letter for determining the percentage passthrough for the Standard A 3-Digit Mail versus using a relatively low cost Automation AADC presort rate for benchmarking the 3-Digit First-Class automation "costs avoided".