

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF POSTAL SERVICE WITNESS BOZZO TO
INTERROGATORY OF THE ABA AND NAPM (ABA&NAPM/USPS-T21- 60),
REDIRECTED FROM WITNESS ABDIRAHMAN
(June 24, 2005)

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatory of ABA and NAPM, filed on June 10, 2005, and redirected from witness Adbirahman: ABA&NAPM/USPS-T21- 60.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402
June 24, 2005

Response of United States Postal Service Witness Bozzo
To Interrogatories of American Bankers Association and National Association of
Presort Mailers
Redirected from Witness Abdirahman

ABA&NAPM/USPS-T21-60. In your answer to ABA&NAPM/USPS-T21-23, you simply restate the question in your answer. WHAT FACTOR(S) explain the notable decline in MODS productivity for the operations noted in the interrogatory?

Response.

My understanding is that the Postal Service is unaware of operational factors that explain the productivity variation for the 3-pass DPS operation category.

Because of the small number of MODS observations underlying this category, the associated productivity is sensitive to outlying data points. The 2000 data, in particular, appear to contain several high-productivity outliers.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
June 24, 2005