

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-40-42)
(June 13, 2006)

The United States Postal Service hereby provides its responses to the above-mentioned interrogatories of David B. Popkin, filed on May 30, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-40. Please provide data showing the unit cost for single piece First-Class Mail articles in the parcel shape category on an ounce by ounce basis from 1 ounce up to 13 ounces. Please provide information on how the data was calculated and cite a reference for every number that was utilized in the calculation.

Response:

The following table provides estimated TY08 unit costs by shape and ounce increment for single piece First-Class Mail.

Ounce Increment	TY08 Unit Cost (Cents)		
	Letters	Flats	Parcels
0 - 1	21.0	89.7	276.3
1 - 2	39.6	62.5	123.4
2 - 3	91.4	63.9	171.4
3 - 4	68.1	66.7	139.3
4 - 5	80.8	63.8	156.7
5 - 6	121.7	69.8	160.5
6 - 7	57.7	66.6	161.9
7 - 8	149.4	81.4	208.0
8 - 9	137.8	81.2	183.1
9 - 10	88.2	98.5	190.9
10 - 11	55.1	81.9	210.5
11 - 12	304.6	115.9	258.0
12 - 13	38.9	88.4	204.3

Source: USPS-LR-L-139, TY08 1SP Wgt.xls, sheet 'Summary TY08.'

The cost calculations update the methods employed in Docket No. R2001-1, USPS-LR-J-58. Supporting documentation for the TY08 calculations are contained in USPS-LR-L-139.

Note that individual ounce increments' unit costs may be subject to substantial sampling variability, particularly for higher ounce increments in the letter shape category. For additional discussion of the appropriate use of the data, please

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see Docket No. R2000-1, USPS-T-28, at 3-5; Tr. 44/19470-19474; Tr. 44/19481-
19482.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-41. Same as DBP/USPS-40 except for articles in the flat shape category.

RESPONSE:

Please see the response to DBP/USPS-40.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-42. Same as DBP/USPS-40 except for articles in the letter shape category.

RESPONSE:

Please see the response to DBP/USPS-40.