

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MITCHUM  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS PAGE  
(OCA/USPS-T23-3)

The United States Postal Service hereby files the response of Witness Mitchum to the above listed interrogatory, filed on June 2, 2006, and redirected from witness Page.

The 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

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David H. Rubin  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
June 19, 2006

**RESPONSE OF POSTAL SERVICE WITNESS MITCHUM  
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**OCA/USPS-T23-3.** This interrogatory seeks information about the number of scans for Confirm service. Please refer to LR-L-59, and the Excel file "Confirm.xls."

- a. Please provide the total number of scans actually provided to the 16 subscribers of the "Silver" subscription service in the base year, FY 2005.
- b. Please provide the cost per scan (or cost per one million scans) for the 16 subscribers of the "Silver" subscription service in the base year, FY 2005. Please show all calculations.
- c. Please provide the total number of scans actually provided to the 119 subscribers of the "Gold" subscription service in the base year, FY 2005.
- d. Please provide the cost per scan (or cost per one million scans) for the 119 subscribers of the "Gold" subscription service in the base year, FY 2005. Please show all calculations.
- e. Please provide the total number of scans actually provided to the 45 subscribers of the "Platinum" subscription service in the base year, FY 2005.
- f. Please provide the cost per scan (or cost per one million scans) for the 45 subscribers of the "Platinum" subscription service in the base year, FY 2005. Please show all calculations.
- g. Please provide the total estimated number of scans for each block of one million units to be provided to Confirm subscribers in the test year after rates.
- h. Please provide the cost per scan (or cost per one million scans) for scans purchased in blocks for Confirm subscribers in the test year after rates. Please show all calculations.

**RESPONSE:**

- a. These data are not available for the entire FY 2005. Data of this type were not readily available in a reliable format until September 2005, so there is no accurate source of how many scans were actually used by a subscriber in FY 2005. Confirm data are tracked on the basis of the current subscription period and the subscription periods typically do not match up to the Postal Service's fiscal year. For the purpose of estimating Confirm usage for the rate case I

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extrapolated annual usage from the limited data we had about each subscriber's current subscription usage between September 2005 and December 2005 as detailed in the response to POIR 4, question 3.

b. The only information regarding cost per scan is presented in the response to OCA/USPS-T40-15.

c. See response to part a.

d. See response to part b.

e. See response to part a.

f. See response to part b.

g. The average estimated number of scans on a typical block of one million units is 357,143.

h. See response to part b.