

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH (USPS-T-13)  
TO INTERROGATORIES OF AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS (ABA-NAPM/USPS-T13-1)  
(June 28, 2006)**

The United States Postal Service hereby provides the response of Witness Smith (USPS-T-13) to the following interrogatory of American Bankers Association and National Association of Presort Mailers: ABA-NAPM/USPS-T13-1, filed on June 14, 2006.

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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Frank R. Heselton  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-5204; Fax: -6187  
June 28, 2006

**RESPONSE OF POSTAL SERVICE WITNESS MARC A. SMITH TO  
INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS**

**ABA-NAPM/USPS-T-13-1.** In the PRC version of your mail processing cost pool spread sheet, you have provided FY2005 base year unit costs by cost pool and calculated total. See LR-L-99, file shp05prc.xls. In the USPS version, however, you have not provided the corresponding table for FY2005 base year unit costs. See LR-L-53. Please provide that table with the same labels for rows as used in your table for TY2008 unit mail processing costs by cost pool and calculated total.

**RESPONSE:**

The requested table is provided in Library Reference USPS LR-L-143, "Base Year Mail Processing Costs by Shape, USPS Version."

## 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.

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Frank R. Heselton

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
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