

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

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**RESPONSE OF WITNESS POSCH TO INTERROGATORY OF
THE UNITED STATES POSTAL SERVICE
USPS/POSTCOM-T3-1**

The Association for Postal Commerce, the Alliance of Independent Store Owners and Professionals, the Direct Marketing Association, the Mailing and Fulfillment Service Association, and the Saturation Mailers Coalition (herein collectively "PostCom") hereby provides the responses of Witness Posch to Postal Service interrogatory USPS/PostCom-T3-1-1, filed September 19, 2006.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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RESPONSE OF POSTCOM WITNESS POSCH TO INTERROGATORY OF THE
UNITED STATES POSTAL SERVICE

USPS/POSTCOM-T3-1. Please refer to page 6 of your testimony. Please provide the basis for your statement that pieces weighing more than 3.5 ounces "can and do run readily on ...older...generation sorting equipment."

RESPONSE:

The question takes my testimony wholly out of context and, indeed, truncates the sentence it purports to quote. That sentence reads in its entirety as follows:

However, it is manifestly unfair to mailers, and shortsighted by the Postal Service, to require mailers to pay the rates applicable to flats for pieces that can and do run readily on both older and next generation sorting equipment.

The bases for this conclusion may be summarized as follows. As I state elsewhere in the same paragraph of that testimony, "the Postal Service has acknowledged that it has deployed letter sorting equipment that can process letters up to six ounces, so long as the piece otherwise meets the external dimensions of a letter (with some preparation constraints). Further, the Postal Service has acknowledged that some of the "older" generation sorting equipment is being retrofitted in this fashion. Thus, both older and next generation sorting equipment are and will be used to process letter shaped pieces that exceed 3.5 ounces and in fact exceed the maximum weight of heavy letters contemplated by Postcom's proposal.

Finally, as a practical matter, it is difficult to credit the proposition that an increase in weight of up to a maximum of half an ounce in the definition of a

RESPONSE OF POSTCOM WITNESS POSCH TO INTERROGATORY OF THE
UNITED STATES POSTAL SERVICE

heavy letter will significantly degrade the day-to-day operational efficiency of the Postal Service's letter sorting equipment. The Postal Service has acknowledged that it has not performed any recent studies on either older or new generation equipment to support this proposition.