

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

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

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Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS SAMUEL T. CUTTING TO INTERROGATORY OF  
MAJOR MAILERS ASSOCIATION (MMA/USPS-T26-1(a)-(b))  
(May 16, 2005)

The United States Postal Service hereby files the response of witness Samuel T. Cutting to interrogatory MMA/USPS-T26-1(a)-(b), submitted on May 2, 2005. Parts (c)-(d) of interrogatory MMA/USPS-T26-1 were redirected to the Postal Service for an institutional response.

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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Keith E. Weidner

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-6252; Fax -3084

RESPONSE OF POSTAL SERVICE WITNESS CUTTING  
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION

**MMA/USPS-T26-1.** In Table 1 on page 4 of your testimony, you indicate that First-Class presorted letters incur \$28.911 million in window service costs.

- (a) When you use the term “First-Class Presort”, do you mean just nonautomation letters or do you mean nonautomation letters and automation letters?
- (b) Are you aware that First-Class workshare letters are either loaded directly onto USPS-controlled trucks by workshare mailers who have plant loading agreements or delivered to the Postal Service at a business mail entry unit (BMEU) or a USPS platform or dock? If no, please explain.
- (c) Explain what specific functions window service clerks perform that causes costs to be attributed to First-Class workshare letters.
- (d) Please provide all documents and other information you relied upon in reaching your conclusion that First-Class presort letters incur window service costs.

**RESPONSE:**

- a) I mean both automation and nonautomation presort.
- b) Yes.