

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

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

Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ABDIRAHMAN TO INTERROGATORY OF AMERICAN BANKERS
ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS
(ABA&NAPM/USPS-T21-19)

The United States Postal Service hereby files the response of witness Abdirahman to the following interrogatory of the American Bankers Association and the National Association of Presort Mailers: ABA&NAPM/ USPS-T21-19, filed on May 3, 2005. Interrogatories ABA&NAPM/USPS-T21-1-18 have been redirected to witness Bozzo.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 17, 2005

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ABDIRAHMAN TO INTERROGATORIES OF THE MAJOR MAILERS ASSOCIATION

ABA&NAPM/USPS-T21-19.

Please refer to the USPS-LR-K-48, file LR-K-48FCLTRS.xls, the sheet "ENTRY PROFILE." For the entire rate categories listed in this table the entry profiles are obtained from Docket No. R971-1, LR-H-185. Please confirm that between R97-1 and R2005-1 the values have not changed. If confirmed, please explain why you expect no change. If not confirmed, please explain why there was no study to update the entry profile data.

RESPONSE:

Confirmed. However, the mail characteristics data contained in the "ENTRY PROFILE" spreadsheet are only used to separate the First-Class Mail nonautomation presort letters rate category volume by presort level and machinability. Given that the definition of the nonmachinable surcharge was expanded to include nonmachinable nonautomation presort letters in Docket No. R2001-1, the machinability distribution of that rate category has likely changed to some extent. I did not update the entry profile data because more recent mail characteristics data results were not available.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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