

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-T21-65)

The United States Postal Service hereby files the response of witness
Abdirahman to the above-listed interrogatory of the American Bankers Association and
the National Association of Presort Mailers, filed on June 10, 2005 and revised on June
23, 2005.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089; Fax -5402
June 24, 2005

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS
ABDIRAHMAN TO THE INTERROGATORY OF AMERICAN BANKERS
ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS**

REVISED JUNE 23, 2005

ABA&NAPM/USPS-T21-65

In ABA&NAPM/USPS-T21-20 you were asked in Parts b and c to create two columns comparing operation code by operation code each MODS and NON MODS cost pool for the Automation 3-Digit First –Class letters and Standard A 3-Digit Regular letter. You did not do so. Please do so now. You were also asked in part c. if the differences noted in b. between the two mail categories did not explain the difference in passthroughs noted, then what does, but you did not do so. Please do so now.

Response:

Please see the response to ABA&NAPM/USPS-T-21-58.

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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June 24, 2005