

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

**Rates and Service Changes to Implement
Baseline Negotiated Service Agreement
With Washington Mutual Bank**

Docket No. MC2006-3

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS ALI AYUB (APWU/USPS-T1-1-2)
(May 10, 2006)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO (APWU) hereby submits interrogatories and requests for production of documents to USPS witness Ali Ayub. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

Darryl J. Anderson
Counsel for American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
E-mail: DAnderson@odsalaw.com

APWU/USPS-T1-1. In his testimony on June 29, 2005 for the R2005-1 rate case, Mr. Abdirahman indicated that there had been a problem with appropriately allocating costs between the non-automated and automated presort categories of both First Class and Standard letter mail. This resulted in too many costs being allocated to the non-presort category and too few costs being allocated to the automated category [R2005-1 Tr. 4 1139-1147].

- a. Please identify all adjustments you performed to Mr. Abdirahman's mail processing cost data to correct for this problem and show your calculations.
- b. If you did not correct for this problem, please explain why it is appropriate to use these cost numbers in calculating the estimated financial impact this NSA might produce for the Postal Service.

APWU /USPS-T1-2. On May 3, 2006, the Postal Service filed an omnibus rate case (R2006-1) that contains updated cost data and rates that, if approved, will take effect during the proposed three-year time period for this agreement. Please update your cost and revenue analysis to show the financial impacts that you now anticipate given this additional information.