

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF PITNEY BOWES INC.
TO UNITED STATES POSTAL SERVICE WITNESS
THOMAS A. BOZZO
(PB/USPS-T12-1-4)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness Thomas A. Bozzo.

Respectfully submitted,

/s/

James Pierce Myers
Attorney at Law
1211 Connecticut Avenue, NW
Suite 610
Washington, DC 20036
Telephone: (202) 331-8315
Facsimile: (202) 331-8318
E-Mail: jpm@piercemyers.com

Michael F. Scanlon
PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
1735 New York Avenue, NW
Washington, DC 20006
Telephone: (202) 628-1700
Facsimile: (202) 331-1024
E-Mail: mscanlon@prestongates.com

Counsel to PITNEY BOWES INC.

DATED: May 30, 2006

PB/USPS-T12-1. Please confirm that the productivities in USPS-LR-L-48 and USPS-LR-L-110 do not include any hours in platform and dispatch activities. If you cannot confirm, please state specifically where platform and dispatch activities are included in the productivities in USPS-LR-L-48 and USPS-LR-L-110.

PB/USPS-T12-2. Please refer to page 14 of your testimony in R2005-1 which states:

Insofar as each piece fed must be brought to and dispatched from the operation, related container handlings (including handlings to send mail back through the operation for subsequent sorting passes) will also be proportional to TPF, as will “overhead” not-handling time that is driven by the handling workhours. Handling-mail time and associated overheads account for the vast bulk of workhours in sorting operations, so there is little in the way of causal avenues for workload measures other than TPF to enter the relationship between hours and mail processing “outputs.”

Is this still your opinion? If not, please explain why.

PB/USPS-T12-3. Please refer to page 13 and 14 of your testimony in R2005-1 which states:

. . . increases in mailer worksharing activities will, in general, substitute for Postal Service TPF and TPH handlings, but not necessarily for FHP. Compared to an otherwise identical 3-digit presort piece, for instance, a 5-digit presort piece will avoid the incoming primary TPF and TPH, but not the incoming FHP count. The mailer’s worksharing effort has reduced the needed Postal Service effort without being recognized in FHP.

Is this still your opinion? If not, please explain why.

PB/USPS-T12-4. Please refer to pages 40 and 41 of your testimony which state:

. . . for allied labor and general support operations, it is possible to view cost causation as following a “piggyback” model, in which the costs in support operations are viewed as driven by – and thus volume-variable to the same degree as – the “direct” operations.

Is this still your opinion? If not, please explain why.