

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS TAUFIQUE  
(OCA/USPS-T32-2)

The United States Postal Service hereby files its response to the above-listed interrogatory, filed on June 2, 2006, due on June 16, 2006, and redirected from witness Taufique.

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

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Nan K. McKenzie

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June 19, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE, REDIRECTED FROM WITNESS TAUFIQUE

**OCA/USPS-T32-2.** Please provide the proposed Test Year After Rate unit costs for the following rate categories of First-Class Mail. Include in your response to the following interrogatory, the derivation of all calculated values, cite all sources, and provide copies of those source documents not previously filed.

- a. The First-Class Single Piece first-ounce letter,
- b. The First-Class Single Piece first-ounce flat,
- c. The First-Class Single Piece first-ounce parcel,
- d. The First-Class Automation Letter first-ounce cost for,
  - (i) Mixed AADC,
  - (ii) AADC,
  - (iii) 3-digit, and
  - (iv) 5-digit,
- e. The First-Class Automation Letter Additional ounce cost,
- f. The First-Class Automation Flat first-ounce cost for,
  - (i) Mixed AADC,
  - (ii) AADC,
  - (iii) 3-digit, and
  - (iv) 5-digit.
- g. The First-Class Automation Flat Additional ounce cost.

**Response:**

Please note that the Postal Service method for disaggregating costs by shape and ounce increment produces Test Year Before Rates unit costs.

a.-c. Please see the response to DBP/USPS-40.

d.-g. It is not possible to deaverage presorted First-Class Mail by both weight and rate category.

## **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.

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Nan K. McKenzie

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June 19, 2006