

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

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**Postal Rate and Fee Changes, 2006**

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**Docket No. R2006-1**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS OF PITNEY BOWES INC. TO UNITED STATES  
POSTAL SERVICE WITNESS MARK D. McCRERY  
(PB/USPS-T42-14-15)**

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 Mark D. McCrery. If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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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: June 29, 2006

**PB/USPS-T42-14.** Please provide a list of all facilities where the Postal Service delivery point sequences letters.

**PB/USPS-T-42-15.** Please confirm that delivery point sequencing of letters is generally performed at the destination sectional center facilities listed on Labeling List L005 of the Domestic Mail Manual. If you cannot confirm, please explain fully.