

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,)
2006) Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
TO USPS WITNESS DONALD J. O'HARA
(ABA-NAPM/USPS-T31-1)
(July 6, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, the American Bankers Association and the National Association of Presort Mailers direct the following interrogatories to United States Postal Service witness Donald J. O'Hara (USPS-T31-1). 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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Attached is a table showing Cost Coverages for First Class mail and Standard A Mail from 1994 on, including a comparison to the system-wide average. Please confirm that the figures in the attached table are correct. If you do not confirm, please provide the correct numbers.

**Recent Cost Coverages For First Class and Standard A Mail
Compared to System-Wide Average for All Mail & Special Services**

Cost Coverage

	System-Wide Average	First-Class			Standard A		
		Total	Single-Piece	Presort	Total	Regular	ECR
1994	155%	167%	150%	216%	148%	131%	217%
1995	163%	173%	151%	247%	157%	140%	227%
1996	164%	175%	150%	262%	159%	144%	230%
1997	181%	204%	182%	275%	166%	154%	242%
1998	179%	209%	186%	276%	161%	142%	248%
1999	168%	196%	175%	259%	149%	136%	207%
2000	171%	202%	174%	280%	156%	135%	220%
2001	171%	202%	173%	278%	157%	135%	233%
2002	173%	207%	176%	286%	157%	137%	224%
2003	186%	218%	181%	314%	175%	152%	263%
2004	185%	219%	180%	321%	174%	154%	245%
2005	176%	210%	172%	301%	172%	160%	204%
2006*	188%	227%	187%	332%	178%	160%	244%
2007	181%	217%	177%	309%	178%	168%	209%
TY2008	188%	226%	183%	317%	185%	177%	213%

	System-Wide Average	Compared to Average			Compared to Average		
		First-Class			Standard A		
		Total	Single-Piece	Presort	Total	Regular	ECR
1994	155%	1.07	0.97	1.39	0.96	0.85	1.40
1995	163%	1.06	0.93	1.52	0.97	0.86	1.40
1996	164%	1.07	0.91	1.60	0.97	0.88	1.40
1997	181%	1.13	1.01	1.52	0.92	0.85	1.34
1998	179%	1.16	1.04	1.54	0.90	0.79	1.38
1999	168%	1.17	1.04	1.54	0.89	0.81	1.23
2000	171%	1.18	1.02	1.64	0.91	0.79	1.28
2001	171%	1.18	1.01	1.63	0.92	0.79	1.36
2002	173%	1.19	1.02	1.65	0.91	0.79	1.29
2003	186%	1.17	0.97	1.69	0.94	0.82	1.41
2004	185%	1.18	0.97	1.73	0.94	0.83	1.32
2005	176%	1.19	0.97	1.71	0.97	0.91	1.16
2006*	188%	1.21	0.99	1.76	0.94	0.85	1.30
2007	181%	1.20	0.98	1.71	0.98	0.93	1.15
TY2008	188%	1.20	0.97	1.68	0.98	0.94	1.13

Source: R97-1, ABA/EEI/NAPM-T-1, Page 37; USPS, Cost and Revenue Analysis, Fiscal Year 1994 through 2005; for 2007, revenues are from R2006-1, USPS-LR-L-131, Exhibit USPS-31C and volume variable costs are from R2006-1, USPS-T-10, Exhibit USPS-10L. TY2008 data are from R2006-1, LR-L-131, Exhibit USPS-31B.

* Values for 2006 are from R2005-1, TY2006, USPS-T-27, Exhibit USPS-27B.