

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF  
AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
TO USPS WITNESS BOZZO  
(ABA-NAPM/USPS-T12-1)  
(July 12, 2006)

Pursuant to sections 25, 26 and 27 of the Commission's rules of practice, the American Bankers Association and the National Association of Presort Mailers direct the following interrogatories to United States Postal Service witness A. Thomas Bozzo (USPS-T-12). 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,

David M. Levy  
Paul A. Kemnitzer  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005-1401  
(202) 736-8000

*Counsel for National Association of  
Presort Mailers*

Robert J. Brinkmann  
Irving D. Warden  
1101 17th Street, N.W., Suite 605  
Washington DC 20036  
(202) 331-3037

Gregory F. Taylor  
AMERICAN BANKERS ASSOCIATION  
1120 Connecticut Ave., N.W.  
Washington DC 20036  
(202) 663-5434  
*Counsel for American Bankers  
Association*

**ABA-NAPM/USPS-T12-1.** Starting on page 6, line 19, of your testimony (USPS-T-12), you indicate that one change you have made since R2005-1 is: “I reorganized the BCS and MPBCS cost pools” to reflect the fact of “gradual withdrawal of MPBCS equipment from service in favor of DBCS equipment.”

(a) Because deployment of DIOSS is expected to be completed in 2007, have you similarly controlled for the phase out of older technology in favor of DIOSS technology? If so, please fully explain what you have done and how it affects your productivities and shares. If not, please explain fully why you have not controlled for this change, as you have done for DBCS.

(b) Similarly, because Phase 2 of PARS is expected to be completed in 2007, how, if at all, have you reflected this productivity improvement for UAA mail into your models? Please explain your answer fully.

(c) Have you incorporated into your model the “availability of extra sort bins on the DBCS equipment” that USPS witness McCreery refers to in his testimony (USPS-T-42) at page 11, line 11? If your answer is “yes,” please explain fully how you have accounted for extra bins on DBCS equipment. If your answer is “no,” why have you not incorporated the extra bins and how does that affect your productivities and shares?