

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE AND THE
MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS JAMES W. PAGE**

(POSTCOM/USPS-T23-1-2)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein collectively "PostCom") direct the attached First Set of Interrogatories to Witness James W. Page. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T23-1. Please refer to LR-L59, Attachment 17, which provides costs for Confirm[®] service for FY 1999 through FY 2008.

- a. Please provide all data to show costs by scan associated with Confirm[®] service broken down by mail class for each subscription level (silver, gold, and platinum) for FY 2005.
- b. Please provide all data to show costs by scan associated with Confirm[®] service broken down by First-Class and Standard Mail for FY 2008.
- c. Please provide all data and supporting documentation to demonstrate all volume variable costs associated with additional scans broken down by First-Class and Standard Mail.
- d. Please describe all components included in “Services” (line item 34).
- e. Please explain the cause of the drop in the cost of “Services” (line item 34) from \$643,134 in FY 2005 to \$460,000 in FY 2008.

POSTCOM/USPS-T23-2. Please provide a breakdown of costs by Origin Confirm versus Destination Confirm.