

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH (USPS-T-13)
TO INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND NATIONAL
ASSOCIATION OF PRESORT MAILERS (ABA-NAPM/USPS-T13-2)
(July 26, 2006)**

The United States Postal Service hereby provides the response of Witness Smith (USPS-T-13) to the following interrogatory of American Bankers Association and National Association of Presort Mailers: ABA-NAPM/USPS-T13-2, filed on July 12, 2006.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Frank R. Heselton
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-5204; Fax: -6187
July 26, 2006

**RESPONSE OF POSTAL SERVICE WITNESS MARC A. SMITH TO
INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS**

ABA-NAPM/USPS-T13-2.

In LR-L-99, you provide the unit mail processing costs for First Class Single Piece Metered Letters in this case using the PRC methodology. Please provide the same information as found in PRC TY Letters (4), pages 1 through 5, by cost pool and total using the USPS methodology.

RESPONSE:

This information is provided in my response to APWU/USPS-T13-2. See spreadsheet SmithAttachmentQ2.xls, sheet Letters (4), row 47. See also witness Van-Ty-Smith's response to APWU/USPS-T11-1, which confirms the First-Class single-piece metered mail volume variable mail processing labor costs provided by APWU. These labor costs were used in the spreadsheet SmithAttachmentQ2.xls (on sheet Letters, row 51) to obtain the results on sheet Letters (4), row 47.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Frank R. Heselton

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