

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

**POSTAL RATE AND FEE CHANGES**

**Docket No. R2006-1**

**Major Mailers Association's  
Follow Up Interrogatories and Document Production Requests To Postal  
Service Witness Abdulkadir M. Abdirahman (MMA/USPS-T22-53)  
(July 26, 2006)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association submits the following interrogatories and document production requests to Postal Service Witness Abdulkadir M. Abdirahman (MMA/USPS-T22-53).

Respectfully submitted,

**Major Mailers Association**

By: \_\_\_\_\_

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**Dated: Middleburg, Virginia  
July 26, 2006**

**MMA/USPS-T22-53**

Please refer to your revised responses to Interrogatory MMA/USPS-T22-2 (E) and (F), 3 (C), (E) and (F), and 4 (D) and (E). In each of those answers you claim that CRA cost changes from R2005-1 TY 2006 and R2006-1 TY 2008 cannot be properly compared because “there was a change to the method used to collect and assign IOCS tallies.” On the other hand you did confirm the percentages shown a table that is reproduced for your convenience below:

Letter Rate Category	Total Unit Cost			"Proportional" Unit Cost		
	TY 2006 R2005-1	TY 2008 R2006-1	Percent Increase	TY 2006 R2005-1	TY 2008 R2006-1	Percent Increase
Single Piece	11.42	12.02	5.3%	7.16	7.66	7.0%
Presorted	4.12	4.59	11.4%	2.41	2.80	16.2%
Standard Presorted	4.34	4.06	-6.5%	2.53	2.40	-5.1%

- A. Is it your position that, even though the CRA data indicates that total unit costs have increased much more for First-Class presorted letters (11.4%) than for First-Class single piece letters (5.3%), actual costs probably did not increase by those amounts? Please explain your answer.
- B. Is it your position that, even though the CRA data indicates that proportional unit costs have increased much more for First-Class presorted letters (16.2%) than for First-Class single piece letters (7.0%), actual costs probably did not increase by those amounts? Please explain your answer.
- C. Please explain how a change to the method used to collect and assign IOCS tallies would impact First-Class costs as presented in Parts (A) and (B).
- D. Please explain where in any Postal Service witness testimony it is specifically explained how the change in the method to collect and assign IOCS tallies would impact First-Class costs as presented in Parts (A) and (B) and provide citations to the specific portions of such testimony, if any.