

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS McCRERY  
TO INTERROGATORIES OF PITNEY BOWES, INC.  
(PB/USPS-T42-16-18)  
(July 28, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-listed interrogatories of Pitney Bowes, Inc., filed on July 14, 2006.

Each 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

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Sheela A. Portonovo

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3012, FAX -6187

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY  
TO INTERROGATORIES OF PITNEY BOWES INC.

**PB/USPS-T42-16.** Please refer to your response to MMA/USPS-T21-64 (Redirected to T-29) in R2005-1. Please confirm that your response to that interrogatory in this case would be the same. If you do not confirm, please provide a full explanation of how your response would differ.

**Response:**

I am unable to confirm as the interrogatory MMA/USPS-T21-64 was not redirected to USPS-T29 in R2005-1. The response was provided by USPS-T21 in R2005-1.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY  
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**PB/USPS-T42-17.** Please refer to your response to PB/USPS-T29-9 in R2005-1. Please confirm that your response to that interrogatory in this case would be the same. If you do not confirm, please provide a full explanation of how your response would differ.

**Response:**

Confirmed.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY  
TO INTERROGATORIES OF PITNEY BOWES INC.

**PB/USPS-T42-18.** Please refer to your response to PB/USPS-T29-10 in R2005-1. Please confirm that your response to that interrogatory in this case would be the same. If you do not confirm, please provide a full explanation of how your response would differ.

**Response:**

Confirmed.