

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION
DIRECTED TO WITNESS TAUFIQUE
(MMA/USPS-T32-9(C) THROUGH (J))
(August 28, 2006)

The United States Postal Service objects to the above-listed interrogatories as improper follow-up. The interrogatories were directed to witness Taufique (USPS-T-32) on August 21, 2006. They read as follows:

- C. For R2006-1 BY 2005, how many First-Class workshared mailers had plant load agreements with the Postal Service?
- D. For R2006-1 BY 2005, how many First-Class workshared mailers' plant locations had plant load agreements with the Postal Service?
- E. For R2006-1 BY 2005, please provide the total volume of First Class workshared letters sent by mailers with whom the USPS had plant load agreements. Please provide the data source used to answer this question.
- F. Information on the Postal Service's web site at <http://www.usps.com/postalone/businessmail.htm> indicates that Business Mail Acceptance (BMA) occurs at 850 mailer plants. If BMA occurs at a mailer's plant, does the mailer also have a plant load agreement with the Postal Service? Please explain your answer.
- G. For R2006-1 BY 2005, how many of the 850 mailer plants use BMA for acceptance of First-Class workshared letters?
- H. For R2006-1 BY 2005, what was the total volume of First Class workshared letters that was accepted at the mailer plants identified in response to Part G of this interrogatory.
- I. For R2006-1 BY 2005, what was the lowest volume of First Class workshared letters that was accepted at a mailer plant identified in response to Part G of this interrogatory.
- J. For R2006-1 BY 2005, how many mailers of First Class workshared letters sent out such workshared letter mail using PostalOne!'s web

based simplified mail acceptance procedures?
Although the interrogatories are designated by MMA as “follow up” questions, they do not in fact follow up on the substance of any of witness Taufique’s previous interrogatory responses. Instead, these questions are an attempt to open new lines of written cross-examination directed at witness Taufique after the July 14, 2006, deadline for discovery on the Postal Service’s direct testimony in this proceeding. Accordingly, the Postal Service objects.

As the deadline for discovery directed to the Postal Service has not passed, the questions will be redirected to the Postal Service for institutional response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
July 28, 2006