

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
ASSOCIATION FOR POSTAL COMMERCE WITNESS OTUTEYE
(USPS/POSTCOM-T8-1-2)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Association for Postal Commerce witness Otuteye: USPS/POSTCOM-T8-1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3179 Fax -6187
September 19, 2006

USPS/POSTCOM-T8-1.

Please reconcile the following three statements in your testimony:

1) From page 8, lines 10 through 12

"....the biggest difference in how our letters run through automation equipment is not dependent on the envelope weight but is related to the maintenance of the Postal Service equipment."

2) From page 9, lines 13 through 16

"The only difference in treatment between these heavier, "manual" labeled envelopes and our other, lighter envelopes seems to be that the Postal Service may choose to blend in our heavier envelopes to be processed along with lighter pieces."

3) From page 9, lines 18 through 20

"We know of no examples where our mail in the 3.5 ounce to four ounce range has not been processed and automated exactly like all our other saturation envelopes weighing less than 3.5 ounces."

USPS/POSTCOM-T8-2.

When you state in your testimony on page 8, lines 2 and 3, that "We know of no facility that is not actually automating and processing our envelopes weighing from 3.5 ounces to four ounces," please provide the number of facilities for which this statement can be substantiated for pieces weighing from 3.5 to 4.0 ounces, and also provide the total number of facilities into which you deposit 3.5 to 4.0 ounce pieces. Please provide all documents or notes related to these claims.