

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
MAJOR MAILERS ASSOCIATION WITNESS BENTLEY
(USPS/MMA-T1-25-26)

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 Major Mailers Association witness Bentley: USPS/MMA-T1-25-26.

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 27, 2006

USPS/MMA-T1-25 Please refer to page 29 of your testimony where you describe the Docket Nos. R2000-1 and R2001-1 High Volume QBRM studies that relied on CBCIS data and were used to estimate costs covered by the per-piece fee.

a) Please confirm that both studies assumed all CBCIS mail volume for a given BRM recipient at each facility would be processed using the methods indicated in the respective surveys, and did not incorporate factors that would result in a portion of that mail volume being processed manually (e.g., BRMAS/Other Software acceptance rates less than 100 percent, expired processing window, etc.). If you cannot confirm, please explain.

b) Please confirm that the Docket No. R97-1 and Docket No. R2006-1 BRM Practices Studies are more comprehensive in scope than the Docket No. R2000-1 and Docket No. R2001-1 CBCIS analyses, because they account for BRM mail that may be processed manually. If you cannot confirm, please explain.

USPS/MMA-T1-26 Please refer to your testimony in Appendix II, page 1, lines 20 to 22 where you state, "In this proceeding, the Postal Service proposes to limit derived QBRM cost savings by producing a 'narrowly defined cost analysis' that eliminates from consideration any costs that QBRM saves after the first barcoded sortation."

a) Please confirm that the cost analysis presented in this docket is similar to the analysis that served as the basis for the QBRM cost saving estimate in Docket No. R97-1, because it calculates costs up to the point where a given mail piece receives its first barcoded sortation on a Bar Code Sorter (BCS). If you cannot confirm, please explain.

b) Please confirm that in Docket No. R2001-1, Postal Service witness Miller (USPS-T-22, Section IV) explained that the Docket No. R2000-1 analysis had

been incorrectly expanded to include costs beyond those in the original Docket No. R97-1. If you cannot confirm, please explain.

c) Please confirm that in Docket Nos. R2001-1, R2005-1, and R2006-1, the final versions of the QBRM cost model presented by the Postal Service all included cost analyses similar to the analysis proposed in Docket No. R97-1. In other words, the only expanded final cost model version ever presented by the Postal Service was that presented in Docket No. R2000-1. If you cannot confirm, please explain.