

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  
PITNEY BOWES WITNESS PANZAR  
(USPS/PB-T1-15 - 18)

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 PB witness Panzar: USPS/PB-T1-15 - 18.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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October 4, 2006

USPS/PB-T1-15. Please refer to your testimony at page 8, lines 18 - 20. Where, and by whom, is a “policy objective” of a “universal workshare discount” stated? How would you define the term “universal workshare discount”?

USPS/PB-T1-16. Please refer to your testimony at page 10, lines 1 - 3. Your statement about the average haul of First-Class Mail relative to the average haul of all other classes of mail is stated as an expectation. Do you have any empirical information to confirm that expectation? If empirical information were to contradict that expectation, would not that necessarily imply that the magnitude of potential benefits of distance related rates for First-Class Mail is likely to be smaller than your testimony suggests? Please explain fully.

USPS/PB-T1-17. Please refer to your testimony at page 15, lines 17 - 19. How would you propose to implement a discount for properly addressed mail pieces (e.g., considering that when pieces are mailed, whether or not they are properly addressed is not known)?

USPS/PB-T1-18. Please refer to your testimony at page 18, lines 10 - 11. Please explain how “the costs of the Postal Service would fall by more than the revenues lost through the discount” if (a) “the Postal Service saves \$0.10 for each piece” (pg. 16, lines 23 - 24), and (b) the discount is \$0.10 (pg. 18, line 8).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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