

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF POSTAL SERVICE WITNESS TAYMAN  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T6-14)

The United States Postal Service hereby provides the response of witness Tayman to the following interrogatory of the Office of the Consumer Advocate, filed on May 13, 2005: OCA/USPS-T6-14. The interrogatory is stated verbatim and is followed by the response.

Additional time is needed to prepare an up-to-date response to interrogatories 12 and 13, which were filed the same day. The OCA has indicated that it does not object and a motion for late acceptance will accompany those responses, expected to be filed early next week.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Scott L. Reiter

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May 26, 2005

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAYMAN  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T6-14. Please submit Exhibit 6I, "Summary of Net Income (Loss) & Equity, FY 1971 – FY 2005," with all information broken out separately for (1) "nonpostal" services and (2) postal services (domestic and international).

- a. Provide all underlying calculations, worksheets, and primary sources.
- b. State explicitly all assumptions made.
- c. Separately identify development costs for each "nonpostal" service.
- d. Separately identify start-up costs for each "nonpostal" service.
- e. Separately identify capital costs for each "nonpostal" service.
- f. Separately identify common and joint costs for each "nonpostal" service and in total. Include all calculations, worksheets, and primary sources for the allocation of joint and common costs between DMCS/International Mail services and "nonpostal" services.
- g. Separately identify costs associated with each "nonpostal" service that has been terminated or discontinued.
- h. Separately identify the operating costs of each "nonpostal" service.
- i. Separately identify the revenues of each "nonpostal" service.

Response:

To the extent available, the requested information will be provided in response to OCA/USPS-43 through 54.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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May 26, 2005