

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS SMITH
(MPA/USPS-T13-1)
(June 29, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Marc A. Smith (USPS-T-13). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

David M. Levy
Paul A. Kemnitzer
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005-1401
(202) 736-8000

*Counsel for Magazine Publishers of America,
Inc., and Alliance of Nonprofit Mailers*

MPA/USPS-T13-1. Please refer to your attachment to PSA/USPS-T13-3, your response to PSA/USPS-T13-9(d), and page 41 of USPS-LR-L-43.

(a) Do you believe that the most likely explanation for the difference between the RPW estimate of 1.8 million Periodicals Outside County parcels and the ODIS estimate of 36.6 million Periodicals Outside County parcels is that ODIS records Periodicals Outside County automation flats that are between $\frac{3}{4}$ inch and $1\frac{1}{4}$ thick as parcels, and RPW records these mailpieces as flats? If not confirmed, please explain fully.

(b) Please confirm that IOCS records the costs for Periodicals Outside County automation flats between $\frac{3}{4}$ inch and $1\frac{1}{4}$ thick as Periodicals Outside County parcel costs. If not confirmed, please explain fully.

(c) Please confirm that the vast majority of mail processing costs reported for Periodicals Outside County parcels are probably incurred processing Periodicals Outside County flats. If not confirmed, please explain fully.

(d) Please provide the unit cost for Periodicals Outside County nonletters by cost pool for each of the cost pools shown on page 41 of USPS-LR-L-43. Produce documents sufficient to verify your response.