

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH, USPS-T13,  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC., AND  
ALLIANCE OF NONPROFIT MAILERS: MPA/USPS-T4-1, REDIRECTED FROM  
WITNESS HARAUSH  
(July 28, 2006)**

The United States Postal Service hereby provides its response to the above-referenced interrogatory, filed on July 14, 2006.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Frank R. Heselton  
Attorney

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July 28, 2006

**RESPONSE OF POSTAL SERVICE WITNESS MARC A. SMITH TO  
INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC., AND  
ALLIANCE OF NONPROFIT MAILERS, REDIRECTED FROM WITNESS  
HARAHUSH**

**MPA/USPS-T4-1.** This question refers to:

- USPS-T-13, Attachment 13, which shows a unit Periodical Outside County cost for parcels of approximately \$26.
- The attachment to PSA/USPS-T13-3, which shows an RPW volume estimate of 1.8 million Periodicals Outside County parcels and an ODIS volume estimate of 36.6 million Periodicals Outside County parcels.
- Your response to POIR No. 5, Question 16(b), where you state: “There are other instances where Periodicals may show as flats on mailing statements and parcels in the data systems.”

(a) Do you believe that the most likely explanation of the \$26 unit cost estimate for Periodicals Outside County parcels is that some Periodicals “show as flats on mailing statements and parcels in [IOCS]”? If not, please explain fully.

(b) Given the \$26 unit cost estimate for Periodicals Outside County parcels, do you believe that most of the costs in IOCS for Periodicals Outside County parcels are actually costs for Periodicals Outside County pieces that “show as flats on mailing statements”? If not, please explain fully.

**RESPONSE:**

- a. Quite possibly, but I can not say for sure.
- b. I don’t know. It is possible, but I have not studied this. Please see my response to PSA/USPS-T13-7.

## 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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Frank R. Heselton

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