

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS YEH  
TO INTERROGATORIES OF POSTAL COMMERCE  
(POSTCOM/USPS-T38-7 - 8)**

The United States Postal Service hereby provides the responses of witness Yeh to the following interrogatories of Amazon.com, Inc., filed on August 17, 2006:

POSTCOM/USPS-T38-7 - 8. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 31, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
TO INTERROGATORY OF POSTAL COMMERCE

**POSTCOM/USPS-T38-7.**

During cross-examination, you stated you would need to “double check with my spreadsheets formula” to correctly answer whether you applied the two-to-one ratio to non-presorted pieces to presort unit non-transportation costs in the development of your rate proposal for Media Services. (See USPS-T-38 at 8, 16; Yeh Tr. at 2041:6-7).

- a. Please confirm that you applied this ratio in the development of your rate proposal for Media Services.
- b. If you do not confirm, please provide any workpapers or other documents showing how the two-to-one ratio was applied to either or both Bound Printed Matter and/or Media Services.
- c. Please explain why this ratio was not applied to the development of Media Services rates but was applied in the development of Bound Printed Matter rates.

Response:

- a. Not confirmed.
- b. Please see cells [Ha] and [Ja] in WP-BPM-10 of the Bound Printed Matter spreadsheets in Library Reference USPS-LR-L-41.
- c. The two-to-one ratio was applied to the development of Bound Printed Matter rates to recognize a difference in non-weight-related non-transportation costs for Nonpresort BPM and Presort BPM. Estimates of non-weight-related non-transportation costs for Nonpresort BPM are not available due to its relatively small volume. Estimates for non-weight-related non-transportation costs for Single Piece Media Mail are available, hence it was not necessary to apply the two-to-one ratio to the development of Media Mail rates.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH  
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**POSTCOM/USPS-T38-8.**

In your response to POSTCOM/USPS-T38-3(b), you stated that you did not have data available that showed separately the average weight of Bound Printed Matter parcels and flats and the average density of Bound Printed Matter parcels and flats. During cross-examination, you reiterated that this data was not available to you and that you did not know "if the Postal Service has them somewhere." (Yeh Tr. at 2049:15-16). You were then asked if you could identify the witness who has this data. Please provide the name of the witness who has this data, if available.

RESPONSE:

After inspection of RPW by shape data, I have calculated the average weight of Bound Printed Matter parcels and flats. The average weight of BPM parcels is 3.14 pounds and the average weight of BPM flats is 1.39 pounds. It is my understanding that the average density of Bound Printed Matter parcels and flats is not available and no witness has this data.