

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

Postal Rate Commission
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS W. HARAHUSH
(NAA/USPS-T4-1-3)**

June 21, 2006

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Thomas W. Harahush (USPS-T-4) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker
William B. Baker
WILEY REIN & FIELDING LLP
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 719-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

June 21, 2006

William B. Baker
William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS W. HARAUSH
(NAA/USPS-T4-1-3)**

NAA/USPS-T4-1: Please refer to Table 2 of your testimony. Is it a correct interpretation of Table 2 that approximately 50 percent (0.1966 + 0.2990) of FY2005 flat-shaped mail that generated city carrier costs consisted of Standard Enhanced Carrier Route mail? If not, please provide the most accurate characterization of this table.

NAA/USPS-T4-2: Please refer to Table 2 of your testimony. Are data available to separate the "ECR All Other" category into "High Density" and "Basic"? If so, please provide that data or explain where it can be found.

NAA/USPS-T4-3: Please refer to Table 2 of your testimony. Do the ECR saturation and ECR All Other categories include both commercial and nonprofit mail? If so, are data available to allow commercial and nonprofit mail to be presented separately for this Table? If Table 2 does not include both commercial and nonprofit mail, what are the proportions for nonprofit Standard mail?