

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 PAUL RIDDLE
(NAA/USPS-T5-1-2)
June 21, 2006**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Paul Riddle (USPS-T-5) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker
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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 PAUL RIDDLE
(NAA/USPS-T5-1-2)**

NAA/USPS-T5-1: Please refer to Table 4 of your testimony. Is it a correct interpretation of Table 4 that approximately 46 percent ($0.1087 + 0.3528$) of FY2005 flat-shaped mail that generated rural carrier costs consisted of Standard Enhanced Carrier Route mail? If not, please provide the most accurate characterization of this table.

NAA/USPS-T5-2: Please refer to Table 4 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.