

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

Postal Rate Commission  
Submitted 6/30/2006 10:25 am  
Filing ID: 50065  
Accepted 6/30/2006

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS JAMES M. KIEFER  
(NAA/USPS-T36-11-15)  
June 30, 2006**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness James M. Kiefer (USPS-T-36) 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 30, 2006

William B. Baker  
William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS JAMES M. KIEFER  
(NAA/USPS-T36-11-15)**

NAA/USPS-T36-11: Prior to revising your testimony to estimate no conversion from DALs to on-piece addressing of saturation flats in the Test Year, you had assumed a 50 percent conversion rate. Did you have any basis for assuming whether the converting mail would have been piece-rated or pound-rated?

NAA-USPS-T36-12: In First-Class Mail, a goal of witness Taufique's proposal is to obtain similar unit contributions from Single-Piece letters in the aggregate and from Presort letters in the aggregate. In Standard Regular and ECR mail, do you consider it desirable to achieve similar unit contributions from any particular categories of mail?

NAA/USPS-T36-13: Please refer to your response to NAA/USPS-T36-1. Assume an alternative rate design in which the rate for a Basic ECR flat was set higher than for a Basic letter (*i.e.*, no non-zero passthrough of the cost difference). How would that be less supportive of the Postal Service's automation and sequencing goals than your proposal to set the Basic flat rate equal to the letter rate?

NAA/USPS-T36-14: What consideration did you give to the effect of the rate increases proposed for Standard ECR High Density on mailers of High Density flats?

NAA/USPS-T36-15: Please state your understanding of the rate categories of mail used by newspaper Total Market Coverage programs.