

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS BOZZO
(MPA/USPS-T12-4)
(June 30, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatory to United States Postal Service witness A. Thomas Bozzo (USPS-T-12). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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MPA-ANM/USPS-T12-4. Please refer to the results of the activity analysis using IOCS data that you report in your testimony (USPS-T-12) on page 27, Table 2.

(a) Could this activity analysis be performed for other mail processing cost pools besides those included in Table 2?

(b) If the answer to part (a) above is affirmative, can the procedures requested in MPA-ANM/USPS-T12-1 be used to perform the analysis for other mail processing cost pools besides those reported in Table 2? In particular, can the IOCS codes that produce the five categories of activities, requested in MPA-ANM/USPS-T12-1d, be used directly to produce an analogous activity analysis for the mail processing cost pools that are not reported in Table 2?

(c) If the procedures provided in MPA-ANM/USPS-T12-1 cannot be applied directly to perform the analogous activity analysis for other mail processing cost pools, please describe what changes in the procedures would be required to allow them to be applied to those other mail processing cost pools. In particular, please provide the IOCS codes that could be used to produce the five categories of activities for the mail processing cost pools that are not reported in Table 2. In addition, please provide any necessary detail for selecting appropriate IOCS observations for these other mail processing cost pools to perform the analogous activity analysis.

(d) Please provide a table analogous to Table 2 that provides the resulting activity analysis for the other mail processing cost pools where such analysis can be performed, consistent with parts (a) through (c) of this interrogatory.