

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
THOMAS HARAHAUSH TO INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF
AMERICA
NAA/USPS-T4-1-3

The United States Postal Service hereby provides the responses of witness Thomas Harahush to the following interrogatories of the Newspaper Association of America:

NNA/USPS-T4-1-3, filed on June 21, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 5, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE
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OF NEWSPAPER ASSOCIATION OF AMERICA

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.

RESPONSE:

Confirmed.

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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.

RESPONSE:

Of the 29.20 percent of ECR All Other in Table 2, 3.52 percent are High Density and 26.38 percent are Basic.

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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 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?

RESPONSE:

The ECR saturation and ECR All Other categories include both commercial and nonprofit mail.

Data are not available to allow commercial and nonprofit to be presented separately for this Table.