

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 KELLEY  
TO INTERROGATORY OF MPA (MPA/USPS-T30-1)  
(July 13, 2006)

The United States Postal Service hereby provides the response of witness Kelley to the following interrogatory of MPA, filed on June 29, 2006: MPA/USPS-T30-1.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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July 13, 2006

**Response of Postal Service Witness Kelley to Interrogatory  
Of the Magazine Publishers of America, Inc**

**MPA/USPS-T30-1.** Please refer to your 7.083-cent estimate of the unit delivery cost for Standard Mail ECR Non-Saturation Flats in Table 1 of your testimony. If city carriers perform flat preparation activities – such as opening bundles and removing packaging –for ECR Non-Saturation Flats, would the city carrier costs for these activities be captured in your unit delivery cost estimate for Standard Mail ECR Non-Saturation Flats? Please explain your response fully.

**Response**

The unit delivery costs derived in Table 1 include all volume variable costs from cost segments 6, 7 and 10. To the extent that the activity described in the question is performed by city carriers, the volume variable portions of those costs are included in the unit costs in Table 1 of USPS-LR-L-67.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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