

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

POSTAL RATE AND FEE CHANGES, 2006 )

Docket No. R2006-1

AMAZON.COM, INC.  
FOURTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS NINA YEH (AMZ/USPS-T38-28-31)  
(July 14, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Amazon.com, Inc. hereby submits interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

---

William J. Olson  
John S. Miles  
Jeremiah L. Morgan  
WILLIAM J. OLSON, P.C.  
8180 Greensboro Drive, Suite 1070  
McLean, Virginia 22102-3860  
(703) 356-5070

Counsel for Amazon.com, Inc.

**AMZ/USPS-T38-28.**

For the proposed **Media Mail** rates shown in USPS-T-38, Attachment C, please provide a table showing TYAR allocated costs, including contingency by rate cell, in a format similar to that provided for Priority Mail in USPS-T-33, Attachment F, Table 18.

**AMZ/USPS-T38-29.**

For the proposed **BPM Basic Presort** rates in USPS-T-38, Attachment A, page 2, please provide a table showing TYAR allocated costs, including contingency by rate cell, in a format similar to that provided for Priority Mail in USPS-T-33, Attachment F, Table 18.

**AMZ/USPS-T38-30.**

For the proposed **BPM Basic Presort Destination Entry** rates in USPS-T-38, Attachment A, page 3, please provide a table showing TYAR allocated costs, including contingency by rate cell, in a format similar to that provided for Priority Mail in USPS-T-33, Attachment F, Table 18.

**AMZ/USPS-T38-31.**

Please refer to your response to AMZ/USPS-T38-11.

- a. Your response referenced, *inter alia*, DMM section 163.4.0(b). Please confirm that the correct DMM section reference should have been, and is, 163.4.1(b). If you do not confirm, please explain the applicability of section 163.4.0(b).

- b. Please confirm that the three DMM sections that you referenced allow nonprint attachment and enclosures (*e.g.*, CD's and DVD's) in BPM mailpieces (i) if the individual cost of each nonprint attachment and enclosure is less than or equal to a low cost item as defined in DMM section 703.1.6.11 (Products Mailable at Nonprofit Standard Mail Rates), and (ii) that the combined cost of all such attachments and enclosures is not more than two times the cost of a low cost item as defined in DMM section 703.1.6.11.
- c. Please confirm that the current maximum cost of a low cost item as defined in DMM section 703.1.6.11 (Products Mailable at Nonprofit Standard Mail Rates) is \$8.60, or provide the correct current maximum cost.
- d. Please explain (i) the rationale for limiting commercial BPM enclosures based on a definition drawn from regulations applicable to Nonprofit Standard Mail rates, and (ii) what relevance or relationship the \$8.60 value has, as a matter of postal policy, to eligibility requirements for a commercial subclass of mail such as BPM.