

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY TO  
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA  
REDIRECTED FROM WITNESS JOYCE K. COOMBS  
(NAA/USPS-T44-6-7)  
(July 14, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the following interrogatory of Newspaper Association of America, filed on June 30, 2006: NAA/USPS-T44-6-7, redirected from witness Coombs.

The 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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**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MCCRERY  
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA  
REDIRECTED FROM WITNESS JOYCE K. COOMBS**

**NAA/USPS-T44-6:** Under current city and rural carrier operations, by what time must a saturation flats mailing entered at an SCF arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

**Response:**

a, b. The guidelines for delivery of ECR Saturation flats range from 2 days after entry for pieces placed on 5-digit pallets to up to 4 days after entry for pieces placed on SCF pallets. These guidelines assume that the mailings were entered at the SCF prior to the facility's critical entry time, which can vary based on the facility's operating plan.

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**NAA/USPS-T44-7:** Under current city and rural carrier operations, by what time must a High Density flats mailing entered at an SCF arrive in order to be delivered

(assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

**Response:**

a, b. The guidelines for delivery of ECR High Density flats range from 2 days after entry for pieces placed on 5-digit pallets to up to 4 days after entry for pieces placed on SCF pallets. These guidelines assume that the mailings were entered at the SCF prior to the facility's critical entry time, which can vary based on the facility's operating plan.