

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH,  
USPS-T-11, TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA,  
INC. AND ALLIANCE OF NONPROFIT MAILERS (MPA/USPS-T11-3)  
(July 28, 2006)**

The United States Postal Service hereby provides the response of Witness Van-Ty-Smith (USPS-T-11) to the following interrogatory of Magazine Publishers of America, Inc. and Alliance of Nonprofit Mailers: MPA/USPS-T11-3, filed on July 14, 2006.

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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July 28, 2006

Response of United States Postal Service Witness Eliane Van-Ty-Smith,  
USPS-T-11, to Interrogatory of Magazine Publishers of America, Inc., and  
Alliance of Nonprofit Mailers

**MPA/USPS-T11-3.** This question refers to:

- Your testimony (USPS-T-11) at page 19, lines 6-8, where you state:  
“Thus, the volume variable cost for the Function 1 support cost pool is distributed in proportion to all Function 1 and LDC 79 volume-variable costs.”
- USPS-LR-L-43 at page 41, which shows CRA Periodicals Flats Mail Processing Unit Costs.

Please list the cost pools (by cost pool number shown on Page 41 of USPS-LR-L-43) that are used to distribute the volume variable cost for the Function 1 support cost pool.

**RESPONSE.**

The cost pools (by cost pool number shown on Page 41 of USPS-LR-L-43) that are used to distribute the volume variable cost for the Function 1 support cost pool are #1 through #34 and #48.

## **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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