

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 COOMBS
TO INTERROGATORIES OF NAA (NAA/USPS-T44-12 – 17)
(July 28, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of NAA, filed on July 14, 2006: NAA/USPS-T44-12 – 17.

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

Eric P. Koetting

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(202) 268-2992, FAX -5402
July 28, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-12.

Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR Basic flats.

RESPONSE:

I am not aware of any significant changes that will occur in city carrier delivery operations for Standard ECR Basic flats between now and the Test Year. FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-13.

Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR High Density flats.

RESPONSE:

I am not aware of any significant changes that will occur in city carrier delivery operations for Standard ECR High Density flats between now and the Test Year. FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-14.

Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR saturation flats.

RESPONSE:

I am not aware of any significant changes that will occur in city carrier delivery operations for Standard ECR saturation flats between now and the Test Year.

FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-15.

Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR Basic flats.

RESPONSE:

I am not aware of any significant changes that will occur in rural carrier delivery operations for Standard ECR Basic flats between now and the Test Year. FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-16.

Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR High Density flats.

RESPONSE:

I am not aware of any significant changes that will occur in rural carrier delivery operations for Standard ECR High Density flats between now and the Test Year. FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-17.

Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR saturation flats.

RESPONSE:

I am not aware of any significant changes that will occur in rural carrier delivery operations for Standard ECR saturation flats between now and the Test Year.

FSS will not be fully deployed in the Test Year so changes from FSS will occur in subsequent years.

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.

Eric P. Koetting

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July 28, 2006