

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FOLLOW-UP INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE AND THE
MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS NINA YEH**

(POSTCOM/USPS-T38-7-8)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing Fulfillment Service Association (herein, collectively "PostCom") direct the attached Follow-up Interrogatories to Witness Nine Yeh. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T38-7. During cross-examination, you stated you would need to “double check with my spreadsheets formula” to correctly answer whether you applied the two-to-one ratio to non-presorted pieces to presort unit non-transportation costs in the development of your rate proposal for Media Services. (*See* USPS-T-38 at 8, 16; Yeh Tr. at 2041:6-7).

- a.** Please confirm that you applied this ratio in the development of your rate proposal for Media Services.
- b.** If you do not confirm, please provide any workpapers or other documents showing how the two-to-one ratio was applied to either or both Bound Printed Matter and/or Media Services.
- c.** Please explain why this ratio was not applied to the development of Media Services rates but was applied in the development of Bound Printed Matter rates.

POSTCOM/USPS-T38-8. In response to POSTCOM/USPS-T38-3(b), you stated that you did not have data available that showed separately the average weight of Bound Printed Matter parcels and flats and the average density of Bound Printed Matter parcels and flats. During cross-examination, you reiterated that this data was not available to you and that you did not know “if the Postal Service has them somewhere.” (Yeh Tr. at 2049:15-16). You were then asked if you could identify the witness who has this data. Please provide the name of the witness who has this data, if available.