

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO  
GROWING FAMILY, INC. WITNESS PAUL  
(USPS/GF-T1-1-5) (September 19, 2006)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Growing Family, Inc. witness Paul:

USPS/GF-T1-1-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, FAX -5402

**USPS/GF-T1-1.** Please refer to your testimony at page 1, lines 6-7, where you state that "Approximately 10% of our total shipments are sent via the USPS's COD service."

(a) What alternative methods does Growing Family use to send the photography orders to the other 90 percent of customers, and what percentage of total shipments are sent via each of those alternative methods?

(b) How is payment made for those other customers?

**USPS/GF-T1-2.** Please refer to your testimony at page 1, lines 7-8, where you state that "the recipients of Growing Family's COD packages have the option of either paying the retail price for the photographs or refusing the packages unopened. . . ." Approximately what percent of the recipients pay for the photos, and what percent refused the packages unopened?

**USPS/GF-T1-3.** Please refer to page 13, lines 2-3 of your testimony, where you state that "we have surveyed addresses from whom we have received neither payment nor the funds."

(a) Please provide the results of any and all surveys Growing Family has conducted since January 1, 1997, of customers from whom it has not received payment. Please provide all the underlying data from such surveys.

(b) Please describe any policies or practices Growing Family has concerning customers from whom it has not received payment.

**USPS/GF-T1-4.** Please refer to page 16, lines 3-5, of your testimony, where you refer to a "very low 'value of service'" for COD service. Please confirm that this low value of service applies only to those pieces for which claims are filed, and the Postal Service either denies the claim or pays at less than the amount to be collected. If you do not confirm, please explain why not.

**USPS/GF-T1-5.** Please refer to page 16, lines 5-8, of your testimony (proposing that the appropriate COD fee for each particular mailing be determined based on the reproduction cost of the item mailed, rather than the amount contents of Growing Family COD mailings). How does basing the COD fee on the reproduction cost for the item mailed comply with criterion 7 of the ratemaking criteria, which specifies consideration of the "simplicity of structure" for the fee schedule?

## **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.

---

Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, FAX: -5402  
September 19, 2006