

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
NATIONAL NEWSPAPER ASSOCIATION WITNESS GARY SOSNIECKI
(USPS/NNA-T2-1-6)

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 National Newspaper Association (NNA) witness Gary Sosniecki: USPS/NNA-T2-1-6. The Postal Service recognizes that witness Sosniecki, a Postal Service customer who owns and publishes a small circulation newspaper, may face challenges of burden or sensitivity in providing responses to these interrogatories. While the interrogatories have been crafted to minimize these possibilities, should such challenges nonetheless arise, even shy of a level warranting an objection, the Postal Service requests that counsel for NNA contact the undersigned counsel informally to explore whether alternatives may be available.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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FIRST SET OF INTERROGATORIES FROM THE UNITED STATES POSTAL SERVICE
TO NATIONAL NEWSPAPER ASSOCIATION WITNESS GARY SOSNIECKI

USPS/NNA-T2-1. Please describe the copies of the *Vandalia Leader* that are prepared and entered as mail.

- a. You indicate that a single copy of the *Vandalia Leader* averages 14 pages (NNA-T-2 at 2); what are the dimensions, shape and weight of a typical copy, including inserts, entered during the school year?
- b. For the issue you select in responding to part (a), please describe how many copies were entered where, and how much postage was paid where, for that issue (entry profile and postage statement).

USPS/NNA-T2-2. On page 4 of your testimony, you describe awards received.

- a. Since you state on page 2 that you and your wife purchased the *Vandalia Leader* three ago, were the two awards from the Missouri Press Association, and the Community Service award from NNA, awarded to you and your wife in your capacities as publishers of some other publication(s)? If so, please identify each, the period of your ownership, and each publication's approximate circulation during the period of ownership.
- b. What other publications have you and/or your wife published in the past. Please provide the same details for each as requested in part (a).

USPS/NNA-T2-3. Please refer to your testimony at page 6, lines 19 – 28. Your descriptions of sacks reflect both that you no longer use them for mailing the *Vandalia Leader* (lines 22 – 23) and that you routinely pick up “extra sacks or tubs” (line 27) as needed for that day's out-of-town mailings. Please reconcile these descriptions.

USPS/NNA-T2-4. Please refer to your testimony at the bottom of page 9. Why do you make two truck deliveries of each issue to the Vandalia Post Office?

USPS/NNA-T2-5. On page 11, line 3, of your testimony, you state, “Our papers have been long-time members of NNA.” Please identify each paper to which this reference applies. For any papers not already identified in your response to USPS/NNA-T2-2, please provide the information requested by part (a) of that interrogatory.

USPS/NNA-T2-6. In Appendix A and various passages of your testimony, you identify service challenges faced by the *Vandalia Leader* that you have apparently worked through with postal officials (and others). Only two matters apparently occurred in the past few months; are any of these challenges still providing ongoing opportunities for improvement? If so, please describe the current situation(s).