

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
NEWSPAPER ASSOCIATION OF AMERICA WITNESS INGRAHAM
(USPS/NAA-T2-1-4)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the above-referenced interrogatories to Newspaper Association of America witness Ingraham.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 22, 2006

USPS/NAA-T2-1 Please refer to footnote 1, page 7 of your testimony.

Is it your view that, for the purposes of proposing and recommending rates under the Postal Reorganization Act, it is improper for the Postal Service and the Commission to consider non-cost factors that lead to the establishment of prices that might, in some circumstances, violate the principle of efficient component-pricing? Please support your view.

USPS/NAA-T2-2 Please refer to page 14, lines 12-16 of your testimony.

When considering the percentage change for the saturation category, is it appropriate for the Commission to consider the additional charge for using DALs, and the effect of the new surcharge? Please provide the basis for your answer.

USPS/NAA-T2-3 Please refer to page 17 of your testimony.

Please explain the ratemaking rationale for offering two different rate designs for ECR mail based solely on the level of expected response to the proposed DAL surcharge.

USPS/NAA-T2-4 Please refer to Table 3 which is located on page 9 of your direct testimony. The ECR Saturation Flat cost cited in the column titled 'Kelley Response to NAA/USPS-T-30-7, 2006' is 5.226 cents. Please confirm that the unit delivery cost in the cell cited should be 5.213 cents based on Witness Kelley's response.