

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO U.S. NEWS & WORLD REPORT, L.P. WITNESS WHITE
(USPS/USNews-T1-1-3)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to U.S. News & World Report, L.P. witness White:

USPS/USNews-T1-1 to 3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 28, 2006

USPS/USNews-T1-1.

Please refer to your testimony at page 6, line 4, where you mention a “somewhat increased incentive to move copies from DSCF to DDDU [sic]” in the Postal Service’s proposal. Please specify what parts of the Postal Service’s proposal create this increased incentive.

USPS/USNews-T1-2.

Please refer to your testimony at page 12, lines 6-7, where you conclude, based on Exhibit A of witness Schick’s testimony in Docket No. C2004-1, that “larger mailers tend to have fewer copies per container than do smaller mailers.” Please provide a more specific cite or other data to back up that conclusion.

USPS/USNews-T1-3.

Please refer to your testimony at page 13, lines 3 5, where you claim that witness Tang does not know how mailers would mail if they did not co-palletize.

(a) Please confirm that, in order to qualify for the experimental co-palletization discounts now in effect, mailers must provide, upon request, presort reports showing how the pieces would have been prepared prior to co-palletization. See DMM 709.3.2a. If you do not confirm, please explain.

(b) Please confirm that it is possible that witness Tang could, following appropriate procedures, obtain access to this information. If you do not confirm, please explain.