

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20068-0001**

**Postal Rate and Fee Changes, 2006**

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**Docket No. R2006-1**

**NOTICE OF NATIONAL NEWSPAPER ASSOCIATION OF FILING OF ERRATUM TO  
TESTIMONY OF WITNESS HEATH**

NNA hereby provides notice of the filing of an erratum to the testimony of NNA Witness Max Heath. The error appears on p. 20 of witness Heath's testimony in the calculation of rates in tables 1 & 2. A corrected page is submitted herewith. The corrected tables should read:

Table 1

The Second Most Efficient - Delivery Unit Entered; CR sorted

2006	2007	% increase
<b>.070</b>	.087	24.56

Table 2

The Most Efficient - Delivery Unit Entered; CR High Density Walk Sequence

2006	2007	% increase
<b>.054</b>	.071	31.8%

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing document online in accordance with the Commission's Rules of Practice.

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October 3, 2006  
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and is most highly presorted actually has a larger increase than the basic Carrier Route rate.

Table 1

The Second Most Efficient - Delivery Unit Entered; CR sorted

2006	2007	% increase
<b>.070</b>	.087	24.56

Table 2

The Most Efficient - Delivery Unit Entered; CR High Density Walk Sequence

2006	2007	% increase
<b>.054</b>	.071	31.8%

The new prices do send a positive signal toward greater drop shipping, with which I agree, and which is essential in this era of declining service. In fact, the only mail that does approach the 25% announced average increase is the delivery-unit entered, carrier route sorted mail which is the most commonly used by a typically efficient newspaper. However, the discounts for delivery office entry are miserly, saving the publisher only about 1.7 cents per copy (on a four ounce paper). As my colleague Sosniecki testifies, when a publisher is dropping bundles of 100 or so newspapers to other post offices and likely traveling 20-50 miles round trip to do so, the payback is hardly an incentive. The \$1.70 cents earned in the discount for that 100 papers wouldn't even pay for the driver's Big Mac on the road.

And most shocking is the fact that high density in-county Delivery Unit entered mail (requiring 125 pieces per route or 25% of active possible deliveries and prepared in walk-sequence order) is in for a heavy 33.3% piece rate hike and a 30.88% to 32.72% over all increase. But its carrier route alternative for