

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 NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK
(USPS/NNA-T3-23-29)
(October 4, 2006)

Pursuant to Rules 25 through 27 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories to National Newspaper Association witness Siwek: USPS/NNA-T3-23-29.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS-NNA-T3-23 In your testimony at page 22, lines 6 to 9, you state, “Ms. Tang thus failed to identify any functionally ‘different’ Within County costs that could help to explain why the USPS has proposed a 24.2 percent increase for Within County periodicals and only an 11.7 percent increase for Outside County periodicals.” Please confirm that the Postal Service determines subclass-level costs independently for Within County and Outside County Periodicals. If you do not confirm, please explain.

USPS/NNA-T3-24 Please refer to Appendix D of your testimony.

(a) Please confirm that USPS-LR-L-126 was revised on July 13, 2006, and August 8, 2006, prior to its receipt into evidence. If you do not confirm, please explain.

(b) Please confirm that Appendix D does not reflect the revisions to the “TYAR B.D.”, “Rate Design Input” and “Piece Discounts 2” worksheets in USPS-LR-L-126 that were filed on July 13, 2006. If you do not confirm, please explain.

(c) If you confirm part (a), and putting aside Appendix D’s increase of the proportion of revenue derived from the piece side on pages 4 and 8 and increase of the passthroughs for carrier route basic and high density on pages 6 and 9, was Appendix D’s failure to reflect the revisions to USPS-LR-L-126 intentional? If it was intentional, please explain.

(d) If it was not intentional, please provide an updated version of Appendix D incorporating the revisions that were made to USPS-LR-L-126 where appropriate.

USPS/NNA-T3-25 In your testimony at page 27, lines 20 to 21, you state, “I recommend that the Commission accept the Within County rate design shown on page 10 of Appendix D.”

(a) Please complete the following table showing the postage rates that would apply to a 4-ounce Within County publication under the rates you propose on page 10 of Appendix D of your testimony, as well as the percentage changes over current rates that those rates would represent. If possible, please provide in Excel format.

<u>Presort Level</u>	<u>Rate</u>	<u>% Change from Current</u>
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Basic Nonauto		
Basic Auto Flat		
Basic Auto Letter		
3D Nonauto		
3D Auto Flat		

3D Auto Letter
5D Nonauto
5D Auto Flat
5D Auto Letter
CR Basic (DU entered)
CR Basic (not DU entered)
CR HD (DU entered)
CR HD (not DU entered)
CR SAT (DU entered)
CR SAT (not DU entered)

(b) Please provide tables in the same format as in part (a) showing the rates and percentage changes over current rates for a 4-ounce Within County publication that would result from the rates shown on i) page 5 of Appendix D of your testimony, and ii) page 7 of Appendix D of your testimony. If possible, please provide in Excel format.

USPS-NNA-T3-26 Please refer to page 7 of Appendix D of your testimony, where you propose rates after increasing the passthrough for carrier route basic and high density. Please provide the percentage increases over current rates for the (a) non-carrier route piece rates and (b) carrier route piece rates on that page.

USPS/NNA-T3-27 Please refer to page 5 of Appendix D of your testimony, where you propose rates after increasing the percent of revenue derived from the piece side to 62.5 percent. Please provide the percentage increases over current rates for the (a) pound rates and (b) piece rates on that page.

USPS/NNA-T3-28 Please refer to page 5 of Appendix D of your testimony, where you propose rates after increasing the percent of revenue derived from the piece side to 62.5 percent. What would those rates be if you set the proportion of revenue derived from the piece side on page 4 of Appendix D to 60 percent rather than 62.5 percent? Please provide the percentage increases over current rates for the (a) pound rates, and (b) piece rates that these rates would represent.

USPS/NNA-T3-29 Please refer to your testimony at page 2, lines 10 to 16. Please confirm that the TYBR and TYAR cost and revenue figures you discuss there do not reflect the revisions to witness O'Hara's exhibits made on August 25, 2006. If you do not confirm, please explain. Was this intentional? If it was intentional, please explain.