

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 HEATH
(USPS/NNA-T1-29-32)
(October 10, 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 follow-up interrogatories to National Newspaper Association witness Heath:
USPS/NNA-T1-29-32.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/NNA-T1-29 Please refer to Appendix B in your response to USPS/NNA-T1-1, and to Table 6 in the testimony of witness Tang (USPS-T-35).

(a) Please confirm that the section of Appendix B headed “Periodicals In-County Rates, R2006-1 USPS Proposed mid-2007” contains, at Column C (the “None” column), a piece rate of 0.142. If you do not confirm, please explain.

(b) Please confirm that the Postal Service has not proposed a piece rate of 0.142 for any rate category in Within County Periodicals. If you do not confirm, please explain.

(c) Please explain why you used a piece rate of 0.142, and explain how it was derived. Please provide any necessary corrections to Appendix B.

USPS/NNA-T1-30 Please refer to Appendix B in your response to USPS/NNA-T1-1, and to Table 6 in the testimony of witness Tang (USPS-T-35).

(a) Please confirm that the section of Appendix B headed “Periodicals In-County Rates, R2006-1 USPS Proposed mid-2007” contains, at Column H (the “Carrier Route Sat W/S Del Ofc” column), a piece rate of 0.033. If you do not confirm, please explain.

(b) Please confirm that the piece rate for Carrier Route Saturation proposed by the Postal Service is 0.032. If you do not confirm, please explain.

USPS/NNA-T1-31 In your testimony at page 19, lines 23 to 26, you state, “a periodical sorted to carrier route high density presort that is not entered at the delivery office could experience a 47.3% increase, while a lower presort periodical also not DU entered would experience a 24.1% increase.” Please refer to Appendix B in your response to NNA/USPS-T1-1.

(a) Please confirm that the range of percentage increases over current rates for carrier route high density presort not entered at the DU that you provide in Appendix B is 27.43 percent to 31.79 percent. If you do not confirm, please explain.

(b) Please provide the underlying calculations specifically supporting your statement that a carrier route high density periodical not entered at the DU could experience a 47.3 percent increase.

(c) Please confirm that when you state on lines 25 to 26 that “a lower presort periodical also not DU entered would experience a 24.1% increase,” you are referring to a 5 oz Carrier Route Basic publication. If

you do not confirm, please identify with specificity (i.e., weight and presort level) the periodical that you are referring to.

USPS/NNA-T1-32 In your testimony at page 19, lines 27 to 29, you state, “a 5 digit auto newspaper would see a 39.71% increase while the same newspaper without a barcode would see an 18.11% increase.” Appendix B in your response to NNA/USPS-T1-1 does not appear to provide the underlying calculations supporting these statements (if it does, please provide the specific cell references).

(a) Please identify with specificity (i.e., weight and shape) the 5 digit auto publication that you are referring to.

(b) Please identify with specificity (i.e., weight) the 5 digit nonauto publication that you are referring to.