

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

SUPPLEMENTAL RESPONSES OF GROWING FAMILY, INC. TO SECOND  
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO  
GROWING FAMILY, INC. WITNESS PAUL  
(USPS/GF-T1-7 and 15)  
(November 17, 2006)

Growing Family, Inc., hereby provides supplemental responses to the above-noted interrogatories of the United States Postal Service to witness Paul. Collection of the data requested was a time-consuming process. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

GROWING FAMILY, INC.

/s/ David R. Straus

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**USPS/GF-T1-7.** Please refer to page 2, lines 4-6 of your testimony. Please provide the annual total package volume for your company, and the annual COD package volume for your company, for every year since 1995.

**RESPONSE:**

Growing Family does not have reliable data for years earlier than 1999. The data beginning in that year are as follows:

<u>FYe 9/30</u>	<u>Total Shipments</u>	<u>COD Shipments</u>	<u>COD %</u>
1999	1,539,794	530,422	34.4%
<b>2000</b>	<b>1,497,897</b>	<b>473,807</b>	<b>31.6%</b>
2001	1,330,618	409,804	30.8%
<b>2002</b>	<b>1,105,531</b>	<b>321,039</b>	<b>29.0%</b>
2003	1,183,573	300,090	25.4%
<b>2004</b>	<b>1,090,045</b>	<b>210,618</b>	<b>19.3%</b>
2005	992,047	151,925	15.3%
<b>2006</b>	<b>941,857</b>	<b>143,027</b>	<b>15.2%</b>

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**USPS/GF-T1-15.** With respect to Growing Family's COD packages mailed with the Postal Service:

- a. What were the average amounts to be collected for COD purchased in 2005, 2004 and 2003?
- b. For what percent of total COD mailings were claims filed in 2005, 2004 and 2003?
- c. Of the claims filed, what percent were determined to be payable in 2005, 2004, and 2003?
- d. Of the claims filed, what percent were reimbursed at the amount to be collected in 2005, 2004 and 2003?
- e. Of the claims filed, what percentage were (1) for loss; (2) for damage; and (3) for no remittance in 2005, 2004 and 2003?

**SUPPLEMENTAL RESPONSE:**

- a. – d. The data requested, to the extent available, are set forth below. Growing Family did not begin to track and save data for parts b, c and d until the Postal Service began to cut the indemnity payments.

<u>Amounts to be Collected for COD's 2003 - 2006</u>									
Amounts Per SAP Report (ZSTATS)									
Includes only digital and filmscan (Excludes Legacy System)									
	Total Count	Other Systems	Per SAP Report (ZSTATS)						
			Count	Pkg. Price	Discount	S & H	Tax	Total	Average
FYe 9/30									
2003 per unit	260,366	183,571	76,795	\$ 2,447,513 \$ 31.87	(\$ 9,957) (\$ 0.13)	\$ 677,644 \$ 8.82	\$ 221,843 \$ 2.89	\$ 3,337,043 \$ 43.45	<b>\$ 43.45</b>
2004 per unit	203,705	121,283	82,422	4,107,794 \$ 49.84	(25,572) (\$ 0.31)	1,111,928 \$ 13.49	367,873 \$ 4.46	5,562,023 \$ 67.48	<b>\$ 67.48</b>
2005 per unit	152,708	31,654	121,054	6,353,289 \$ 52.48	(26,514) (\$ 0.22)	1,650,914 \$ 13.64	557,168 \$ 4.60	8,534,857 \$ 70.50	<b>\$ 70.50</b>
2006 per unit	143,027	-	143,027	7,423,816 \$ 51.90	(20,964) (\$ 0.15)	2,078,896 \$ 14.53	667,153 \$ 4.66	10,148,900 \$ 70.96	<b>\$ 70.96</b>