

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
AND ALLIANCE OF NONPROFIT MAILERS  
TO USPS WITNESS LOETSCHER  
(MPA/USPS-T28-1)  
(June 7, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Paul Loetscher (USPS-T-28). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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**MPA/USPS-T28-1.** Please refer to your response to MPA/USPS-T27-1(g)-(i), where you state, “Please reference Table 13 in the Excel workbook accompanying my response to TW/USPS-T28-7-8, which shows container counts by container type, presort level, and entry facility type. While this is the most detailed information available to estimate the requested container counts, it is not completely sufficient for doing so.”

(a) Please provide your best lower-bound and upper-bound estimates of the percentage of Periodicals Outside County sacks that are entered at the “destination” facility. Please produce data and analyses sufficient to replicate your response, or provide citations to the data and analyses if they are publicly available.

(b) Please provide your best lower-bound and upper-bound estimates of the percentage of Periodicals Outside County pallets that are entered at the “destination” facility. Please produce data and analyses sufficient to replicate your response, or provide citations to the data and analyses if they are publicly available.

(c) Please provide your best lower-bound and upper-bound estimates of the percentage of Periodicals Outside County containers that are entered at the “destination” facility. Please produce data and analyses sufficient to replicate your response, or provide citations to the data and analyses if they are publicly available.