

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

Postal Rate Commission
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOYCE K. COOMBS
(NAA/USPS-T44-1-11)
June 30, 2006**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Joyce K. Coombs (USPS-T-44) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker
William B. Baker
WILEY REIN & FIELDING LLP
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 719-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

June 30, 2006

William B. Baker
William B. Baker

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NAA/USPS-T44-1: Please refer to your testimony at page 6, lines 16-20 and page 8, lines 9-13. Do you anticipate that the FSS being developed and tested in Carmel, Indiana, and that is expected to be deployed starting in 2008, will be able to sequence unbound High Density flats “wraps” bearing an address?

NAA/USPS-T44-2: Are there any weight or other physical characteristics of High Density flats that will affect their ability to be run on the FSS? If so, please describe.

NAA/USPS-T44-3: Please refer to your testimony at page 8, lines 9-11 and your response to VP/USPS-T44-2(a). Please clarify whether, or in what circumstances, you anticipate saturation flats mail will be processed by FSS in 2008.

NAA/USPS-T44-4: Under current city and rural carrier operations, by what time must a saturation flats mailing entered at a DDU arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

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NAA/USPS-T44-5: Under current city and rural carrier operations, by what time must a High Density flats mailing entered at a DDU arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

NAA/USPS-T44-6: Under current city and rural carrier operations, by what time must a saturation flats mailing entered at an SCF arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

NAA/USPS-T44-7: Under current city and rural carrier operations, by what time must a High Density flats mailing entered at an SCF arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

NAA/USPS-T44-8: After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a city route (assuming only one mailing):

- a. on the same day?

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- b. no later than the next day?

NAA/USPS-T44-9: After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a rural route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

NAA/USPS-T44-10: After implementation of FSS sequencing, by what time and where would a saturation flats mailing need to be entered in order to be delivered on a city route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

NAA/USPS-T44-11: After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a rural route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?