

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

)

Docket No. R2006-1

THIRD SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.,  
AND ALLIANCE OF NONPROFIT MAILERS  
TO USPS WITNESS VAN-TY-SMITH  
(MPA/USPS-T11-3)  
(July 14, 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 Elaine Van-Ty-Smith (USPS-T-11). 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-T11-3.** This question refers to:

- Your testimony (USPS-T-11) at page 19, lines 6-8, where you state:  
“Thus, the volume variable cost for the Function 1 support cost pool is distributed in proportion to all Function 1 and LDC 79 volume-variable costs.”
- USPS-LR-L-43 at page 41, which shows CRA Periodicals Flats Mail Processing Unit Costs.

Please list the cost pools (by cost pool number shown on Page 41 of USPS-LR-L-43) that are used to distribute the volume variable cost for the Function 1 support cost pool.