

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE ASSOCIATION OF ALTERNATIVE POSTAL  
SYSTEMS REDIRECTED FROM WITNESS KIEFER  
(AAPS/USPS-T36-3-5, 7)

The United States Postal Service hereby files its responses to above-listed interrogatories, filed on July 6, 2006.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3089; Fax -5402  
July 20, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE  
ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS REDIRECTED FROM  
WITNESS KIEFER

**APS/USPS-T36-3.** Please confirm that from approximately 1993 through approximately 1999, the Postal Service engaged a consultant named SAI to study the structure, rates and/or services of the segment of the alternate delivery industry represented by AAPS here, that is, companies engaged primarily in the door-to-door delivery of advertising material, product samples and usually free newspapers. If you cannot confirm (after reviewing, if necessary, material submitted by AAPS and the Postal Service in Docket Nos. MC95-1, R97-1 and R2000-1), please explain why.

**RESPONSE**

Confirmed. The last report from SAI was dated August 2000.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE  
ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS REDIRECTED FROM  
WITNESS KIEFER

**AAPS/USPS-T36-4.** Has the Postal Service requested or received any studies of the alternate delivery industry since the 1999 update to the SAI report? If so, please describe such studies and provide copies of any reports or updates produced.

**RESPONSE**

Please see the response to AAPS/USPS-T36-3. The August 2000 document was a report on a project to undertake a competitive assessment of alternative delivery systems. A Motion for Protective Conditions had been filed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE  
ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS REDIRECTED FROM  
WITNESS KIEFER

**AAPS/USPS-T36-5.** If the Postal Service has not requested any studies of the alternate delivery industry since the 1999 update to the SAI report, has it obtained similar information—that is, information on the rates and/or services offered by alternative delivery companies—since 1999? If so, please describe those efforts and provide copies of any reports, information or data that were generated.

**RESPONSE**

Aside from the study report described in my response to AAPS/USPS-T36-4, no further studies have been requested or procured.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE  
ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS REDIRECTED FROM  
WITNESS KIEFER

**AAPS/USPS-T36-7.** What percentage of Standard, ECR Saturation pieces fall within the following weight ranges: 0-1 ounce, 1-2 ounces, 2-3 ounces, 3-4 ounces, 4-5 ounces, 5-6 ounces, 6 ounces or more?

**RESPONSE:**

See the following table:

**AAPS/USPS-T36-7**  
**FY 2005 Standard Mail Saturation by Ounce Increment**  
**Source: USPS-LR-L-87 Standard First Wgt Ind Tables.xls**

<b>0 to 1 ounce</b>	31.4%
<b>1 to 2 ounces</b>	18.7%
<b>2 to 3 ounces</b>	23.3%
<b>3 to 4 ounces</b>	7.2%
<b>4 to 5 ounces</b>	9.8%
<b>5 to 6 ounces</b>	4.7%
<b>Over 6 ounces</b>	4.9%

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

---

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
July 20, 2006