

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF NNA (NNA/USPS-T3-26),  
REDIRECTED FROM WITNESS PAFFORD  
(July 27, 2006)

The United States Postal Service hereby provides its response to the following interrogatory of NNA, filed on July 13, 2006: NNA/USPS-T3-26, redirected from witness Pafford.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Eric P. Koetting

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July 27, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF NNA, REDIRECTED FROM WITNESS PAFFORD**

**NNA/USPS-T3-26** Please confirm that in R2000-1 and R97-1, the Commission adjusted volume figures projected for the test year for the Within County subclass to use a multi-year average on the basis of data produced by BRPW. If you do not confirm, please fully explain your response.

**RESPONSE:**

Based on relevant portions of the Commission's Opinions (pages 545-46 in Docket No. R97-1, and page 451 in Docket No. R2000-1), it would appear that the Commission made some type of adjustment along the lines you describe, presumably relating to the circumstances as viewed by the Commission in those cases.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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