

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

RESPONSE OF POSTAL SERVICE WITNESS TANG  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
(MPA/USPS-T35-16)

The United States Postal Service hereby files the response of witness Tang to the above listed interrogatory, filed on July 14, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

RESPONSE OF POSTAL SERVICE WITNESS TANG  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.

**MPA/USPS-T35-16.** This question refers to:

- Worksheet "Container" in USPS-LR-L-126, REV 7-13-2006 LR 126 Outside County Revised.xls, which shows 41.64 pieces per sack.
- USPS-LR-L-88, Appendix F, Table 5, and worksheet "Parameters" in USPS-LR-L-85, 6-8-05-LR-L-85-Revised.xls, which show 45.11 pieces per sack.

Please explain which of these figures is correct for the Test Year.

**RESPONSE:**

The two numbers in question are two different estimates of how the 24-piece minimum rule will affect average sack size. It is my understanding that the 45.11 pieces per sack in LR-L-88 was derived by calculating the average number of pieces in sacks that currently contain 24 or more pieces. The 41.64 pieces per sack figure in LR-L-126 was calculated using a slightly different approach: take the total number of sacks, assume 65 percent of the skin sacks go would go away under the 24-piece rule, and then calculate the average number of pieces for those remaining sacks. In my mind, both are reasonable estimates for use in Test Year calculations.