

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS McCRERY
TO INTERROGATORY OF THE McGRAW-HILL COMPANIES, INC.
(MH/USPS-T42-6)
(August 16, 2006)

The United States Postal Service hereby provides the response of witness McCrery to the above-listed interrogatory of The McGraw-Hill Companies, Inc., filed on August 4, 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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MH/USPS-T42-6. Please refer to your response to MH/USPS-T42-4, and to the publicly-accessible reports at <http://www.redtag.org/redtag/usps/init.asp>. Please confirm the following. If you are unable to confirm, please explain fully and specifically and provide your alternative calculations.

(a) The Delivery Breakdown Reports by Origin Entry Point reported the following percentages of 4-plus days late delivery for 53 weekly publications (“totals” for all entry points):

- August 2005 report: 9%
- September 2005 report: 11%
- October 2005 report: 12%
- November 2005 report: 14%
- December 2005 report: 12%
- January 2006 report: 15%
- February 2006 report: 12%
- March 2006 report: 10%
- April 2006 report: 11%
- May 2006 report: 10%
- June 2006 report: 11%
- July 2006 report: 13%

(b) The average percentage of 4-plus days late delivery for the 53 weekly publications that is reflected in the above reports taken as a whole is 11.66%.

(c) The Delivery Breakdown Reports by Destination Zip Code District, by Destination 3-Digit Zip Code, and by Destination 5-Digit Zip Code, respectively, each report the same percentages of 4-plus days late delivery for the 53 weekly publications over the same time period.

(d) The Percentage On Time Reports by Origin Entry Point report the following “on time” delivery percentages (each corresponding to a particular week or day(s)) for 53 weekly publications (“totals” for all entry points):

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- August 2005 report: 66%, 59%, 59%, 61%, 57% (average: 60.4%)
- September 2005 report: 62%, 46%, 55%, 58%, 61% (average: 56.4%)
- October 2005 report: 53%, 57%, 57%, 53%, 58%, 57% (ave. 55.6%)
- November 2005 report: 63%, 57%, 51%, 51%, 53% (average: 55%)
- December 2005 report: 35%, 50%, 56%, 59%, 50% (average: 50.8%)
- January 2006 report: 36%, 50%, 53%, 55%, 56% (average: 50%)
- February 2006 report: 60%, 54%, 54%, 52%, 52% (average: 54.4%)
- March 2006 report: 61%, 54%, 55%, 59%, 57% (average: 57.2%)
- April 2006 report: 49%, 57%, 56%, 55%, 55% (average: 54.4%)
- May 2006 report: 56%, 58%, 56%, 58%, 54% (average: 56.4%)
- June 2006 report: 58%, 57%, 56%, 58%, 57% (average: 57.2%)
- July 2006 report: 51%, 52%, 45%, 52%, 56%, 64% (ave. 62%)

(e) The average percentage of on time delivery for the 53 weekly publications that is reflected in the above reports taken as a whole is 55.73%

(f) The Percentage On Time Reports by Destination Zip Code District, and by Destination 3-Digit Zip Code, respectively, each report essentially the same on time delivery percentages for the 53 weekly publications over the same time period.

Response:

a – f. A cursory review of the data on the Red Tag web site appears to approximately match the data presented above; however, I have no opinion as to the accuracy of the source data, nor do I have any real knowledge of it. While the math appears to be correct, I believe that the averages need to be weighted based on the total number of instances they reflect in order to provide a meaningful result. For example, if one month's average represents a universe of 100 mail pieces while

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another month's average represents 1000 mail pieces, they should not be treated as equal.