

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

)

Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS TANG  
(MPA/USPS-T35-1-2)  
(May 25, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., directs the following interrogatories to United States Postal Service witness Rachel Tang (USPS-T-35).

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,

David M. Levy  
Paul A. Kemnitzer  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005-1401  
(202) 736-8000

*Counsel for Magazine Publishers of America,  
Inc.*

**MPA/USPS-T35-1.** Please refer to Section IV.A. of your testimony, which discusses the container rate.

(a) Please confirm that mailers may be allowed to enter Periodicals and Standard Mail in the same containers in the Test Year. If not confirmed, please explain fully.

(b) Assume that a pallet contains 100 pieces of Periodicals Outside County mail pieces and 1000 pieces of Standard Mail. What will the Periodicals Outside County container charge be for this container? Please explain fully.

(c) Assume that a pallet contains 1000 pieces of Periodicals Outside County mail pieces and 100 pieces of Standard Mail. What will the Periodicals Outside County container charge be for this container? Please explain fully.

(d) Assume that a pallet contains co-palletized Periodicals Outside County pieces from multiple publications. How does the Postal Service plan to allocate the container charge to the individual publications on the pallet for postage payment purposes?

(e) Assume that a pallet contains co-mailed Periodicals Outside County pieces from multiple publications. How does the Postal Service plan to allocate the container charge to the individual publications on the pallet for postage payment purposes?

(f) How will the container charge be applied to “unsacked” Periodicals Outside County bundles that are not containerized? Please explain fully.

(g) How will the container charge be applied to Periodicals Outside County pieces entered in trays? Please explain fully.

(h) Please produce source documents, or provide citations to source documents, sufficient to verify your answers to the previous parts of this question.

**MPA/USPS-T35-2.** Please refer to the discussion of Ride-Along Pieces on page 14 of your testimony and USPS-LR-L-126, R2006-1 Outside County.xls, worksheet 'Pound Data\_Adv.'

(a) Please confirm that under the proposed rates the average revenue per advertising pound is 28.2 cents. If not confirmed, please provide the correct figure.

(b) Do you have any reason to believe that the zone distribution of Ride-Along pieces is different than the zone distribution of Periodicals Outside County advertising pounds? If so, please explain your response fully and provide the zone distribution of Ride-Along Pieces.

(c) What is the average weight of a Ride-Along Piece?

(d) Please confirm that substituting the average revenue per advertising pound for the Zone 8 advertising pound rate in the formula discussed on Page 14 of your testimony yields a rate of 5.8 cents. If not confirmed, what rate would result from substituting the average revenue per advertising pound into this formula?

(e) Please provide your best estimate of the average cost per piece of a 3.3 ounce Ride Along piece with the same zone distribution as Periodicals Outside County advertising pounds. Please explain your methodology fully.

(f) Please produce source documents, or provide citations to source documents, sufficient to verify your answers to parts (a)-(c), (e) and (f) of this question.