

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 TO INTERROGATORY OF THE  
MAGAZINE PUBLISHERS OF AMERICA, INC., REDIRECTED FROM WITNESS TANG  
(MPA/USPS-T35-2(e))

The United States Postal Service hereby files its response to the above-listed interrogatory subpart, filed on May 25, 2006 and redirected from witness Tang.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Nan K. McKenzie  
Attorney

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June 8, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF  
MAGAZINE PUBLISHERS OF AMERICA, INC., REDIRECTED FROM WITNESS TANG

**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.

**RESPONSE:**

- (e) There are no estimates of the average cost of Ride Along pieces.

## **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.

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Nan K. McKenzie

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