

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 COOMBS  
TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-T44-1 – 2)  
(June 23, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of Douglas Carlson, filed on June 9, 2006: DFC/USPS-T44-1 – 2.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 23, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T44-1.**

Please refer to your testimony at page 14, lines 8-18. Please provide examples of the hybrid or rigid pieces to which you refer.

**RESPONSE:**

The most common example is a thin box that cannot be bent without breaking the box. Such boxes are commonly used, for example, for promotional material or charitable appeals sent to the public containing small prizes or rewards such as beads, toys, or other such items.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO  
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**DFC/USPS-T44-2.**

Suppose an item measures 10" x 14" x ¼" and is rigid, as if designed to transport a photograph while protecting the photograph from being bent.

- a. Would this mail piece be the type of rigid mail piece to which you refer?
- b. Could this mail piece be processed on the AFSM 100?
- c. Could this mail piece be processed on the UFSM 1000?

**RESPONSE:**

a.,b.,c. It depends on the nature of the mailer (a term, in this instance, referring to the packaging item, rather than the individual sending the item). If it is "stiff-as-a-board", then it would certainly be a hybrid. If it is a normal, flexible photo mailer consisting of two thin sheets of uncorrugated cardboard, then it would not be a hybrid. Although I am not the witness testifying on mail processing operations, I am told by mail processing experts that a flexible photo mailer can be processed on the AFSM 100, and that either could be processed on the UFSM 1000.

## 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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