

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS KELLEY
(MPA/USPS-T30-1)
(June 29, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatory to United States Postal Service witness John P. Kelley (USPS-T-30). 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,

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MPA/USPS-T30-1. Please refer to your 7.083-cent estimate of the unit delivery cost for Standard Mail ECR Non-Saturation Flats in Table 1 of your testimony. If city carriers perform flat preparation activities – such as opening bundles and removing packaging – for ECR Non-Saturation Flats, would the city carrier costs for these activities be captured in your unit delivery cost estimate for Standard Mail ECR Non-Saturation Flats? Please explain your response fully.