

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
PAUL RIDDLE TO INTERROGATORIES OF
THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T5-1-2)

The United States Postal Service hereby provides the responses of witness Paul Riddle to the following interrogatories of the Newspaper Association of America: NAA/USPS-T5-1-2, filed on June 21, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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(July 7, 2006)

RESPONSE OF PAUL RIDDLE TO INTERROGATORY FROM
THE NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-T5-1: Please refer to Table 4 of your testimony. Is it a correct interpretation of Table 4 that approximately 46 percent (0.1087 + 0.3528) of FY2005 flat-shaped mail that generated rural carrier costs consisted of Standard Enhanced Carrier Route mail? If not, please provide the most accurate characterization of this table.

RESPONSE:

Not confirmed. A correct interpretation of Table 4 is that approximately 46 percent (0.1087 + 0.3528) of FY2005 mail in the *flats compensation category* that generated rural carrier costs consisted of Standard Enhanced Carrier Route mail. As stated on page 2 of my testimony, estimates are developed by compensation categories. Therefore, Table 4 would not include accountable or Boxholder flat-shaped mail.

RESPONSE OF PAUL RIDDLE TO INTERROGATORY FROM
THE NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-T5-2: Please refer to Table 4 of your testimony. Are data available to separate the “ECR All Other” category into “High Density” and “Basic”? If so, please provide that data or explain where it can be found.

RESPONSE:

Data are available to separate the “ECR All Other” category into “High Density” and “Basic” in the LOTUS.RURAL.FY2005.FY05MC.DATA file provided in USPS-LR-L-12. The file layout is provided on page 28 of the USPS-LR-L-12 documentation. Of the 35.28 percent of ECR All Other in Table 4, 31.47 percent are ECR Basic, 0.56 percent are ECR Basic Auto, and 3.24 percent are ECR High Density.