

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

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Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.,  
AND ALLIANCE OF NONPROFIT MAILERS  
TO USPS WITNESS VAN-TY-SMITH  
(MPA/USPS-T11-2)  
(July 12, 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 interrogatories to United States Postal Service witness Elaine Van-Ty-Smith (USPS-T-11). 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-T11-2.** Please refer to your response to MPA/USPS-T11-1, where you state: “From Table 3 of my testimony, the MODS 99 1SUPP\_F1 cost pool is the one readily seen to be quasi-administrative. It includes the MODS operation numbers and operation names for the two LDC 18 pools identified as 1misc and 1SUPPORT.”

(a) Is the Non-MODS MISC cost pool quasi-administrative? If not, please explain fully.

(b) Please explain how the activities performed in the Non-MODS MISC cost pool differ from the activities performed in the MODS 1misc cost pool.

(c) Why didn't you use the “piggyback” distribution approach for the Non-MODS MISC cost pool? Please explain fully.