

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

)
)

Docket No. R2006-1

FIFTH SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS TANG
(MPA/USPS-T35-14-15)
(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 Rachel Tang (USPS-T-35). 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,

David M. Levy
Paul A. Kemnitzer
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005-1401
(202) 736-8000

*Counsel for Magazine Publishers of America,
Inc., and Alliance of Nonprofit Mailers*

MPA/USPS-T35-14. Please refer to your response to MPA/USPS-T35-12, where you state: “I understand that ride-along pieces (e.g. CDs and DVDs) may make the host flats more rigid.”

(a) Does this statement relate only to ride-along pieces that are CDs or DVDs or does it apply to other ride-along pieces? If the latter, please explain fully and identify the other kinds of pieces to which the statement also applies.

(b) In FY 2005, what percentage of ride-along pieces were CDs and DVDs?

MPA/USPS-T35-15. Please refer to your responses to MPA/USPS-T35-1 and MPA/USPS-T35-9, where you explain that the Postal Service is proposing to apply the entire container charge to every container that contains any Periodicals Outside County pieces. Why is the Postal Service proposing to apply the entire container charge to containers that contain both Periodicals Outside County pieces and other classes of mail (e.g., Periodicals Within County mail or Standard Mail)?