

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20068-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION TO POSTAL SERVICE WITNESS MCCRERY, USPS-T-42
(NNA/USPS-T42-1-4)
July 13, 2006

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service Marc McCrery and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

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July 13, 2006

NNA/USPS-T42-1 Please refer to your testimony on p. 19 where you state:
"More commonly, small volumes of flats for a particular destination are processed manually when the volume is insufficient to justify the fixed costs of setting-up and sweeping a scheme for such a small volume. "

a. Do operations guidelines or procedures set minimum volume standards for the use of UFSM 1000s? If so, please provide a copy. If not, please explain why.

b. If your response to part a. is no, do plant managers have sole discretion in the decision to use the UFSM 1000 or to move mail to manual sorting?

c. Are you aware of circumstances where manual sorting is opted for in plants for purposes of occupying workers who otherwise have no work to do? If your response is yes, are these practices approved by the Postal Service?

NNA/USPS T42-2 Please refer to the description of the elimination of "skin sacks" described in LR-L-49.

a. Please confirm that on May 11, 2006, the Postal Service required periodicals sacks to contain 24 pieces or more.

b. If you confirm, please state whether the Postal Service permits any exceptions to this rule, and if so, under what circumstances.

c. Do you believe that by the test year, skin sacks will have been eliminated? If your response is no, please state what percentage you believe will have been eliminated and explain why the percentage is less than 100.

NNA/USPS T42-3. Please confirm that the Postal Service announced in 2005 that periodicals mailers would be permitted to enter unsacked bundles at Destination Facilities and provide copies of all public announcements and guidance to destination units relevant to this guidance.

NNA/USPS T42-4. If you confirmed NNA/USPS T42-4,

a. Please describe the practices you believe mailers have followed in entering unsacked bundles and, in particular, whether this practice occurs in both Periodicals subclasses;

b. Please confirm that in some circumstances, bundles may not be placed in any container at all, but may be carried manually to a carrier or other postal worker for casing. If you do not confirm, please explain your response fully.

c. In circumstances where an unsacked bundle is entered at a destination facility and is deposited in a container designated by the Postal Service, please

describe the containers that you would expect to be used and explain how they are used.

d. Please describe the status of the development of the practice of entering unsacked bundles. For example, do you believe it is in early stages, well-developed or nearly matured within the postal system. Please fully explain your response.