

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF POSTAL SERVICE WITNESS McCRERY  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC., AND  
ALLIANCE OF NONPROFIT MAILERS (MPA/USPS-T42-17)  
(July 13, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-mentioned interrogatories of Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers, filed on June 29, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**MPA/USPS-T42-17.** Please refer to USPS witness Eggleston's response to CSA/USPS-T26-24 in Docket No. R2000-1, 13 Tr. 5128-29, where she states that "[t]he IOCS handling tallies record the mail actually being handled by the employees recorded as working a given mail processing operation (cost pool), rather than the mail expected to be handled in a given operation." Please also refer to your response to PB/USPS-T29-16 in Docket No. R2005-1.

(a) Please confirm that the Postal Service does (albeit infrequently) handle flat-shaped mail in non-flat operations. If you do not confirm, please explain.

(b) Please confirm that Postal Service clerks and mail handlers do (albeit infrequently) work in operations that are different than the operation into which those employees are clocked. If you do not confirm, please explain.

(c) Please confirm that either of the possibilities identified in parts (a) and (b) could result in a non-zero cost for Periodicals Outside County flats in non-flat cost pools. If you do not confirm, please explain fully.

(d) Do you believe that IOCS mail processing costs for Periodicals Outside County flats in letter sorting cost pools are most likely incurred sorting Periodicals Outside County flats? If not confirmed, please explain fully.

(e) Do you believe that the IOCS mail processing costs for Periodicals Outside County flats in parcel sorting cost pools are most likely incurred sorting Periodicals Outside County flats or bundles of Periodicals Outside County flats? If not confirmed, please explain fully.

(f) Do you believe that the IOCS mail processing costs for Periodicals Outside County flats in Priority and Express Mail sorting cost pools are most likely incurred sorting Periodicals Outside County flats? If not confirmed, please explain fully.

**Response:**

a - f. Confirmed.