

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

Postal Rate Commission  
Submitted 7/13/2006 3:36 pm  
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS JOHN P. KELLEY  
(NAA/USPS-T30-8-10)  
July 13, 2006**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness John P. Kelley (USPS-T-30) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker  
William B. Baker  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

July 13, 2006

William B. Baker  
William B. Baker

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NAA/USPS-T30-8: Please refer to your response to NAA/USPS-T30-6(f), and to city and rural delivery costs as provided in USPS-LR-L-67, UDCModel.USPS, tab “2.summary TY”. In your response to NAA/USPS-T-30-6(f) you provided deaveraged unit delivery costs for ECR Basic flats and ECR High Density flats. Please provide delivery costs for ECR Basic, High Density, and Saturation letters and flats that are disaggregated between city and rural delivery.

NAA/USPS-T30-9: Please provide separate city and rural volume data for each of the rate categories of ECR flats mail.

NAA/USPS-T30-10: Please refer to USPS-LR-L-67, workbook UDCInputs.USPS.xls, tab “TYVol”.

- a. Please confirm that the source of Column D, “TY 2008 BR Pieces” can be found in USPS-LR-L-66, workbook vf\_ar.xls, tab “Attachment A”. If you do not confirm, please advise on the source of the data.
- b. Please confirm that the source of cell D11 in “TYVol” is cell T7 in “Attachment A”. If you do not confirm, please advise on the source of the data.
- c. Please confirm that the source of cell D12 in “TYVol” is cell T8 in “Attachment A”. If you do not confirm, please advise on the source of the data.
- d. Please confirm that the source of cell D15 in “TYVol” is cell T41 in “Attachment A”. If you do not confirm, please advise on the source of the data.

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- e. Please confirm that the source of cell D17 in “TYVol” is cell T58 in “Attachment A”. If you do not confirm, please advise on the source of the data.
  
- f. Please confirm that the source of cell D18 in “TYVol” is cell T45 in “Attachment A”. If you do not confirm, please advise on the source of the data.