

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
AND THE MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS L. PAUL LOETSCHER**

(POSTCOM/USPS-T28-1)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein collectively "PostCom") directs the attached First Set of Interrogatories to Witness L. Paul Loetscher. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T28-1. Please refer to USPS-LR-L-33 at 13 where you state “the hybrid distribution is produced by controlling the ... distribution of UFSM1000 flats by presort rate to the entry profile or profiles of parcels.”

a. In developing your hybrid distribution, did you assume that the presort rules for Standard Mail hybrid flats are likely to be the same as the current presort requirements for Standard Mail UFSM1000 flats? If not, , please explain in detail your assumptions regarding the presort requirements that will apply to hybrid flats.

b. In developing your hybrid distribution, did you assume that the presort requirements for Standard Mail hybrid parcels are likely to be the same as the current presort rules for Standard Mail UFSM1000 flats? If not, please explain in detail your assumptions regarding the presort requirements that will apply to hybrid parcels.

c. Please confirm that the distribution estimates set forth in your library references project that the majority of Standard Mail NFMs are “hybrid parcels.” If not confirmed, please explain your answer fully.