

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

Postal Rate Commission
Submitted 7/14/2006 1:18 pm
Filing ID: 50680
Accepted 7/14/2006

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOYCE K. COOMBS
(NAA/USPS-T44-12-17)**

July 14, 2006

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Joyce K. Coombs (USPS-T-44) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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 14, 2006

William B. Baker
William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOYCE K. COOMBS
(NAA/USPS-T44-12-17)**

NAA/USPS-T44-12: Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR Basic flats.

NAA/USPS-T44-13: Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR High Density flats.

NAA/USPS-T44-14: Please describe any expected differences between current and Test Year city carrier delivery operations for Standard ECR saturation flats.

NAA/USPS-T44-15: Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR Basic flats.

NAA/USPS-T44-16: Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR High Density flats.

NAA/USPS-T44-17: Please describe any expected differences between current and Test Year rural carrier delivery operations for Standard ECR saturation flats.