

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS HARAHUSH
(MPA/USPS-T4-1)
(July 14, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Thomas W. Harahush (USPS-T-4). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

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MPA/USPS-T4-1. This question refers to:

- USPS-T-13, Attachment 13, which shows a unit Periodical Outside County cost for parcels of approximately \$26.
- The attachment to PSA/USPS-T13-3, which shows an RPW volume estimate of 1.8 million Periodicals Outside County parcels and an ODIS volume estimate of 36.6 million Periodicals Outside County parcels.
- Your response to POIR No. 5, Question 16(b), where you state: “There are other instances where Periodicals may show as flats on mailing statements and parcels in the data systems.”

(a) Do you believe that the most likely explanation of the \$26 unit cost estimate for Periodicals Outside County parcels is that some Periodicals “show as flats on mailing statements and parcels in [IOCS]”? If not, please explain fully.

(b) Given the \$26 unit cost estimate for Periodicals Outside County parcels, do you believe that most of the costs in IOCS for Periodicals Outside County parcels are actually costs for Periodicals Outside County pieces that “show as flats on mailing statements”? If not, please explain fully.