Postal Rate Commission
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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

POSTAL RATE AND FEE CHANGES, 2006	Docket No. R2006-1

MOTION FOR LATE ACCEPTANCE OF RESPONSES OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE ASSOCIATION FOR POSTAL COMMERCE REDIRECTED FROM WITNESS KIEFER (POSTCOM/USPS-T36-1-3))

The United States Postal Service hereby moves for late acceptance of its responses to above-listed interrogatories, filed on June 30, 2006, due on July 14, 2006 and redirected from witness Kiefer. The six business day delay was caused by the timing of discussions within the Postal Service and with the counsel for the intervenor who propounded the interrogatories. The counsel agreed that the undersigned could represent that he did not oppose the motion.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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July 24, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE REDIRECTED FROM WITNESS KIEFER

POSTCOM/USPS-T36-1. Please refer to the copies of the DMM Advisories dated June 1, 2006 and June 29, 2006 attached to this document.

b. Does the Postal Service intend to incorporate the physical standards that have been specified in the attached DMM Advisories in the DMM? If so, when will the proposed and final rules be published?
c. Does the Postal Service plan to establish or change any mailpiece characteristics, or rate eligibility or mail preparation requirements during the next eighteen calendar months, with respect to the following rate categories of Standard Mail Regular and Non-Profit Regular:
   i. Automation Letters
   ii. Automation Flats
   iii. Non Flat-Machinables
   iv. Machinable Parcels
   v. Non-Machinable Parcels
d. If not, please explain why not.
e. If so, please describe any and all such changes.
f. Will public input be sought during the development of any or all such additional characteristics or requirements? If not, why not?
g. When will proposed rules addressing each change be published?
h. When will final rules addressing each change be published?
i. With respect to each change identified, does the Postal Service anticipate that it will increase its customers' costs to prepare mail? Why or why not?

RESPONSE:

b. Yes, it is expected that these standards will be included in the DMM after the Federal Register process is completed. The Postal Service is currently developing the rules for Standard Mail to accompany the implementation of the prices resulting from this docket and will publish them for public comment when the draft rules are finished.

c-g. The Postal Service is currently developing the rules for Standard Mail to accompany the implementation of the prices resulting from this docket and will publish them for public comment when the draft rules are finished.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE REDIRECTED FROM WITNESS KIEFER

POSTCOM/USPS-T36-2. Is the Postal Service considering incorporating any rigidity tests in implementation rules with respect to the Standard Mail Non-Flat Machinable category?

a. If so, please describe any tests under consideration.
b. If not, does the Postal Service intend to consider any such tests in the future?
c. If the answer to (b) is affirmative, will mailer input be sought during the development and consideration of such tests?
d. By what date will implementation rules addressing any such tests be published?

RESPONSE:

a-b. Although rigidity is one defining characteristic of NFMs, the NFM category will include both rigid and flexible pieces. Moreover, there is no rate implication within the rate category based on rigidity. Therefore, there does not need to be a test to verify that the NFM is indeed rigid, and there are no plans to consider such tests.

c-d. Not applicable.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE REDIRECTED FROM WITNESS KIEFER

POSTCOM/USPS-T36-3. Please refer to the copy of the DMM Advisory dated June 29, 2006 attached to this document.

a. Please confirm that the 150-piece minimum for Standard Mail automation letters will be maintained upon implementation of the proposed rate structure.

RESPONSE:

a. As noted in the DMM Advisory, which was intended to informally address concerns expressed by mailers, it should be expected that the 150-piece minimum will be maintained. The Postal Service is currently developing the rules for Standard Mail to accompany the implementation of the prices resulting from this docket and will publish them for public comment when the draft rules are finished.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Nan K. McKenzie

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