

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

RESPONSES OF POSTAL SERVICE WITNESS TANG  
TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
(MPA/USPS-T35-14-15)

The United States Postal Service hereby files the responses of Witness Tang to the above listed interrogatories, filed on July 12, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 26, 2006

RESPONSE OF POSTAL SERVICE WITNESS TANG  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.

**MPA/USPS-T35-14.** Please refer to your response to MPA/USPS-T35-12, where you state: "I understand that ride-along pieces (e.g. CDs and DVDs) may make the host flats more rigid."

(a) Does this statement relate only to ride-along pieces that are CDs or DVDs or does it apply to other ride-along pieces? If the latter, please explain fully and identify the other kinds of pieces to which the statement also applies.

(b) In FY 2005, what percentage of ride-along pieces were CDs and DVDs?

**RESPONSE:**

(a) The above statement is not necessarily limited to CDs or DVDs, although it is my understanding that CDs or DVDs make up the bulk of the rigid ride-along pieces. It is also my understanding that no description of ride-along pieces is required at acceptance. Neither am I aware of any system collecting data on the types of ride-along pieces. Therefore, I cannot provide a full list of the kinds of pieces to which the statement also applies.

(b) As mentioned in my response to part (a), I am not aware of any system collecting data on the types of ride-along pieces. So I do not know what percentage of ride-along pieces were CDs and DVDs in FY 2005. However, it is my understanding that the Postal Service evaluated hundreds of samples during the experimental phase of ride-along pieces, and found that about 68 percent of the sampled pieces were CDs and DVDs.

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**MPA/USPS-T35-15.** Please refer to your responses to MPA/USPS-T35-1 and MPA/USPS-T35-9, where you explain that the Postal Service is proposing to apply the entire container charge to every container that contains any Periodicals Outside County pieces. Why is the Postal Service proposing to apply the entire container charge to containers that contain both Periodicals Outside County pieces and other classes of mail (e.g., Periodicals Within County mail or Standard Mail)?

**RESPONSE:**

As stated in my testimony, on pages 4 and 5, the container rate is meant to send an appropriate price signal to encourage better mail preparation and improve Periodicals efficiency. The container rate would apply to a container with any amount of Periodicals Outside County mail in it. For example, the Postal Service does not plan to distinguish between a container with 1000 Outside County pieces only, and a container with 1000 Outside County pieces and also some Within County or Standard Mail pieces. Just like the container rate, the ability to prepare a pallet with mixed classes is intended to encourage more efficient mail preparation which can benefit both the mailer and the Postal Service. The modest 85 cent charge per pallet is not expected to undermine these benefits of co-palletization of mixed classes. In any event, the container charge is an integral part of the pricing for Outside County Periodicals, and should apply to all mailings, regardless of whether they are prepared in conjunction with “non-Outside-County” pieces.