

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO FOLLOW-UP INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-4)

The United States Postal Service hereby files its response to the above listed interrogatory, filed on July 18, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 1, 2006

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MPA/USPS-4. This is a follow-up to the Postal Service's institutional response to MPA-USPS-2. The response states in relevant part:

However, the methodology used to develop MPA-T-25-2b overstates the number of average facilities 5-Digit containers pass through. These estimates were developed under the assumption that all 5-Digit sacks would be opened and the contents distributed at the DDU. If 5-Digit sacks contain mail for zones where the Incoming Secondary sort is performed at the DSCF they may be opened and the contents distributed at the DSCF rather than at the DDU as is assumed implying one less facility passed through.

(a) Please confirm that MPA-2_attach.xls produces an upper-bound estimate of the number of facilities containers pass through. If not confirmed, please explain fully.

(b) Please confirm that reducing by one the number of facilities that 5-Digit sacks pass through in MPA-2_attach.xls produces a lower-bound estimate of the number of facilities 5-Digit sacks pass through. If not confirmed, please explain fully.

(c) Please confirm that DDU-entered containers pass through zero facilities on their way to the destination facility. If not confirmed, please explain fully.

(d) Please confirm that the following table is correct. If not confirmed, please explain fully and provide the correct figures.

**Average Number of Facilities Periodicals Outside County
Containers Pass Through**

Container Type	Upper Bound	Lower Bound
Sack	2.38	2.17
Pallet	0.85	0.85
Total	2.29	2.10

Upper Bound – Calculated using the same method as used to generate MPA-2_attach.xls.

Lower Bound – Calculated using the same method as used in MPA-2_attach.xls, but reduces by one the number of facilities 5-Digit sacks pass through.

Note: Both calculations assume that DDU-entered containers pass through zero facilities.

Response:

(a) – (d) Confirmed.

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.

Nan K. McKenzie

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