

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

POSTAL RATE AND FEE CHANGES, 2006:

Docket No. R2006-1

**INTERROGATORIES DIRECTED BY THE MCGRAW-HILL COMPANIES, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS TANG  
MH/USPS-T35-19**

Pursuant to Rules 25, 26 and 27 of the Rules of Practice, The McGraw-Hill Companies, Inc. directs the accompanying follow-up interrogatories to United States Postal Service witness Rachel Tang (USPS-T-35). To the extent that the witness is unable to provide a full response, please provide a response by the witness best able to respond or by the Postal Service as an institution. If the information requested is not available in the precise format or level of detail requested, please provide responsive information in such format and level of detail as is available. In the event that the Postal Service would otherwise object to any of these discovery requests, please first contact the undersigned counsel to discuss whether the objection may be resolved informally.

Respectfully submitted,

Timothy W. Bergin  
Hall, Estill, Hardwick, Gable, Golden &  
Nelson, P.C.  
1120 20<sup>th</sup> Street, N.W., Suite 700 North  
Washington, D.C. 20036-3406  
(202) 973-1224  
tbergin@hallestill.com

Counsel for The McGraw-Hill Companies, Inc.

**MH/USPS-T35-19.** .Please refer to your response to MH/USPS-T35-12 (a) and (b). Those interrogatories stated: “For purposes of gauging the impact of the proposed rate structure on Outside-County Periodicals mailers: Please provide alternative (non-binding) pound rates” that reflect specified elements of current and traditional rate design but could be expected to meet test year revenue requirements. In response, you stated: “Developing prices involves a balancing of a number of rate design objectives. I cannot develop any hypothetical alternative prices that necessarily would have met those objectives.” However, the interrogatories in question did not call for hypothetical alternative prices that “necessarily would have met those objectives.” Rather, for the purpose of estimating the impact on mailers of proposed rate design changes, the interrogatories simply called upon you to provide alternative (non-binding) pound rates reflecting elements of current and traditional rate design, but adjusted to meet the projected test year revenue requirement. The Postal Service is uniquely positioned to provide such information, which is essential for gauging the impact of proposed rate design on mailers. In this light, please provide the non-binding alternative pound rates as requested.