

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
FLUTE WITNESS PRITCHARD
(USPS/Flute-T1-1-4) (September 19, 2006)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Flute Network witness Pritchard:

USPS/Flute-T1-1-4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer

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USPS/Flute-T1-1. On page 31 of your testimony, you refer to the February 2006 and March 2006 issues of *The Flute Network*. In Exhibit IV of your testimony, you provide the first pages of those two issues. Please provide copies of the entire February 2006 and March 2006 issues of *The Flute Network*.

USPS/Flute-T1-2. For the survey you conducted regarding the February 2006 and March 2006 issues, as you describe the survey on page 31 of your testimony, you requested approximately 6,200 subscribers to *The Flute Network* to respond, and you received 228 responses to your February 2006 request, and 307 responses to your March 2006 request.

Please confirm that the responses you received were based on the readers' individual decisions to respond to the survey, and not a random selection determined by you. If you do not confirm, please explain.

USPS/Flute-T1-3. Please refer to page 8 of your testimony, where you describe how issues of the Flute Network are prepared. You say, at line 10, that the issues are "folded in half again and tabbed."

(a) Do you mean that each mailpiece measures 8 1/2 by 5 1/2 inches (because the 8 1/2 by 11 inch pages are folded over)? If your answer is no, please indicate the measurements of each mailpiece.

(b) When you say that the issues are "tabbed" do you mean that the mailpiece is fastened on the end opposite to the last fold? If your answer is yes, please describe how the issues are tabbed or fastened. If your answer is no, please explain what you mean by "tabbed."

USPS/Flute-T1-4. Have you collected any other raw data on delivery times for *The Flute Network* beyond the data presented at page 29 of your testimony, and the surveys stemming from the February 2006 and March 2006 issues? If your answer is yes, please provide copies of all raw data you collected.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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