

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
POSTCOM WITNESS CLIFTON B. KNIGHT, JR.
(USPS/POSTCOM-T7-1-6)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the above-listed interrogatories to POSTCOM witness Clifton B. Knight, Jr.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 19, 2006

USPS/POSTCOM-T7-1.

- a. Please confirm that employees and/or representatives of BMG Columbia House, Inc. (hereinafter, "BMG") have participated in meetings with USPS concerning redesign of USPS products within the last five years. If not confirmed, please explain fully.
- b. Please confirm that potential changes in the definition of an automated flat were discussed at these meetings. If not confirmed, please explain fully the nature of these discussions.

USPS/POSTCOM-T7-2.

- a. Please confirm that, on or about July 12, 2006, employees and/or representatives of BMG met with USPS personnel, including representatives from USPS Operations and Engineering. If not confirmed, please explain fully.
- b. Please confirm that alternative designs for BMG mailpieces to meet prospective revised flat specifications were discussed at the above referenced meeting. If not confirmed, please explain fully.
- c. Please confirm that, at the above referenced meeting, employees and/or representatives of BMG showed, to USPS personnel, mailpiece designs developed to meet prospective revised flat specifications. If not confirmed, please explain fully.

USPS/POSTCOM-T7-3.

- a. Please confirm that on September 7, 2006, a meeting between employees and/or representatives of BMG and employees and/or representatives of USPS Operations and Engineering was held in Merrifield, VA, in part to facilitate USPS testing of alternative BMG flat mailpieces on an AFSM-100. If not confirmed, please explain fully.
- b. Please confirm that test mailpieces were prepared for this meeting by or for BMG. If not confirmed, please explain fully.

USPS/POSTCOM-T7-4.

- a. For all flats test mailpieces that were designed by or for BMG in the past year to meet prospective revised flats specifications, and for which a physical prototype was developed/created, please provide a complete description and a photograph.
- b. For any prototypes for which multiple copies were produced, please provide a sample.

USPS/POSTCOM-T7-5. Please provide copies of all studies, analyses, reports, memoranda, and emails prepared by or for BMG during the months of July and August, 2006, concerning alternative flats packaging designed to meet prospective revised flats specifications.

USPS/POSTCOM-T7-6 Please refer to page 5 of your testimony, line 20 where you assert that many Internet CD retailers offer free shipping. Is it your assertion that the cost of mailing a customer order will be greater for BMG Columbia House than for these Internet retailers because of the proposed rate increases? If so, please explain and give details.