

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO MAGAZINE PUBLISHERS OF AMERICA, INC.
AND ALLIANCE OF NONPROFIT MAILERS WITNESS COHEN
(USPS/MPA/ANM T1-1-2)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Magazine Publishers of America, Inc. and Alliance of Nonprofit Mailers witness Cohen: USPS/MPA/ANM-T1-1 to 2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/MPA/ANM-T1-1.

Please refer to your testimony at page 6, lines 15-17. Please provide any quantitative support for your statement that postage as a percent of total expenses has grown almost 20 percent just in the last five years.

USPS/MPA/ANM-T1-2.

Please refer to your testimony from page 12, line 8, to page 14, line 23, where you discuss recent increases in the availability of co-mailing and co-palletization.

(a) Please confirm that some publications are not able to either co-palletize or co-mail. If you do not confirm, please explain why.

(b) Why do some publications co-palletize when co-mailing generally offers greater postage savings?