

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

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

**RESPONSES OF WITNESS ANGELIDES TO REDIRECTED
INTERROGATORIES OF
THE UNITED STATES POSTAL SERVICE
USPS/POSTCOM-T7-12 - 13**

The Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein collectively "PostCom") hereby provide the responses of Witness Angelides to Postal Service interrogatories USPS/POSTCOM-T7-12 - 13, filed October 4, 2006.

The interrogatories were redirected from PostCom Witness Knight to Witness Angelides because the questions are outside the scope of Witness Knight's testimony. There is no discussion in Witness Knight's testimony of Postal Service revenue calculations and historic cost coverages for Media Mail.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Jennifer Mallon
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to PostCom and MFSA

October 18, 2006
DC2:\794236

RESPONSES OF POSTCOM WITNESS ANGELIDES TO REDIRECTED
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE

USPS/POSTCOM-T7-12. Please refer to your testimony at page 8, lines 20-21 where you note that the “Media Mail shipment consisting of 5 CDs and weighing 1.3 pounds is charged as if it weighed 2 pounds.”

Please confirm that in the revenue calculations performed by Postal witness Yeh, aggregate Media Mail revenue was also calculated in this manner. If you do not confirm, please explain.

RESPONSE:

Confirmed.

RESPONSES OF POSTCOM WITNESS ANGELIDES TO REDIRECTED
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE

USPS/POSTCOM-T7-13. Please refer to your testimony at page 9, lines 1-3 where you indicate that your postage bill has increased by nearly 30%.

a. Please confirm that, under USPS methodology, the cost coverage for Media Mail in FY 2005 was 90.85%. If you do not confirm, please provide the correct figure.

b. Please confirm that, under USPS methodology, the cost coverage for Media Mail in FY 2004 was 100.8%. If you do not confirm, please provide the correct figure.

c. Please confirm that, under USPS methodology, the cost coverage for Media Mail in FY 2003 was 106.33%. If you do not confirm, please provide the correct figure.

d. Please confirm that, under USPS methodology, the cost coverage for Media Mail in FY 2002 was 96.23%. If you do not confirm, please provide the correct figure.

e. Please confirm that, under USPS methodology, the cost coverage for Media Mail in FY 2001 was 101.44%. If you do not confirm, please provide the correct figure.

RESPONSE:

a. - e. The cost coverages for Media Mail presented in these questions agree with the cost coverages presented in the USPS Cost and Revenue Analyses for FY2001 - FY2005.