

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS MAYES
(MPA/USPS-T25-3)
(July 12, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Virginia J. Mayes (USPS-T-25). If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

David M. Levy
Paul A. Kemnitzer
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005-1401
(202) 736-8000

*Counsel for Magazine Publishers of America,
Inc., and Alliance of Nonprofit Mailers*

MPA/USPS-T25-3. Please refer to your response to MPA/USPS-T25-2(a), where you state: “The DSCF cost avoidance is calculated assuming that DSCF entry avoids one BMC equivalent handling and 0.194 SCF equivalent handlings.” Please also refer to Table 1 of the response to MPA/USPS-T28-1, which shows the number of containers by container type, container presort level, and entry facility type. Is 1.194 the difference in the average number of container handlings between Periodicals entered at the DSCF and the same containers if entered at the DBMC (as the term “DBMC” is used in Table 1 of the response to MPA/USPS-T28-1)? If not, please provide your best estimate of the difference in the average number of container handlings between Periodicals entered at the DSCF and the same containers if entered at the DBMC, based on assumptions consistent with those used to estimate the Periodicals nontransportation destination entry cost avoidance in USPS-LR-L-88.