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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

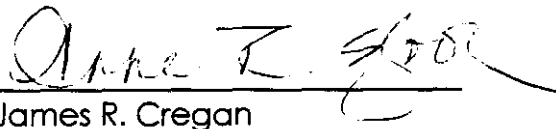
\_\_\_\_\_)  
POSTAL RATE AND FEE CHANGES, 2000 ) Docket No. R2000-1  
\_\_\_\_\_)

\_\_\_\_\_  
FIRST SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS MEEHAN  
(MPA/USPS-T-11-1-3)  
\_\_\_\_\_

(January 21, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of American hereby submits the attached interrogatories to USPS Witness Meehan (MPA/USPS-T11-1-3).

Respectfully submitted,

  
\_\_\_\_\_  
James R. Cregan  
Anne R. Noble  
Counsel  
Magazine Publishers of America, Inc.  
Suite 610  
1211 Connecticut Avenue NW  
Washington DC 20036  
(202) 296 7277

**INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA  
TO UNITED STATE POSTAL SERVICE WITNESS MEEHAN**

**MPA/USPS-T-11-1**

Please refer to page 4 of your Exhibit USPS-11A and page 4 of the FY 1998 PRC Revised RPW Data Version Cost Segments and Components (CSC) report. Note that while accrued rural carrier costs are the same in both reports, the total attributable rural carrier costs specified in the two reports are different.

- (a) Please explain why attributable rural carrier costs in Exhibit USPS-11A are less than those in the FY 1998 PRC Revised RPW Data Version CSC Report.
- (b) If the reason is that the two reports used different data sources, please explain the difference in the underlying data sources.
- (c) If the reason is that the two reports were developed using different methods for estimating volume variability, please explain the differences in methods used.

**MPA/USPS-T-11-2**

Please refer to page 3 of your Exhibit USPS-11A and page 3 of the FY 1998 PRC Revised RPW Data Version CSC (CSC) report. Note that the rural carrier costs for Periodicals Regular Rate in Exhibit USPS-11A are approximately \$15 million higher than those in the FY 1998 PRC Revised RPW Data Version CSC report.

- (a) Please explain why the rural carrier costs for Periodicals Regular Rate in Exhibit USPS-11A are \$15 million higher than those in the FY 1998 PRC Revised RPW Data Version CSC report.
- (b) If the reason is that the two reports used different data sources, please explain the difference in underlying data sources.

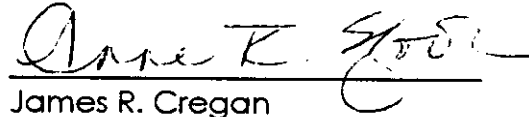
- (c) If the reason is that the two reports were developed using different costing methods, please explain the differences in the methods.

**MPA/USPS-T-11-3**

Please refer to LR-H-80, Cs10.xls and the FY 1998 PRC Revised RPW Data Version CSC Report. Please provide the calculations used by the Postal Service to develop rural carrier costs by subclass for the FY 1998 PRC Revised RPW Data Version CSC report in an electronic spreadsheet format similar to Cs10.xls.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.

  
James R. Cregan  
Anne R. Noble

Washington, D.C.  
January 21, 2000