

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS BARON TO MPA INTERROGATORIES
(MPA/USPS-T12-1-6, 8-31, 36)

The United States Postal Service hereby provides the response of witness Baron to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T12-1-6, 8-31, and 36, filed on February 18, 2000. Interrogatory 7 was redirected to witness Harahush. Interrogatories 32 through 35 were redirected to the Postal Service.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
March 3, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-1. Please refer to Library Reference LR-I-157. Please provide:

- (a) The data set LTV.FLAT.DATA in PC-readable form (i.e., either on Compact Disk or 3 inch floppies), a listing of its properties, and descriptor/identification for each of its fields.**
- (b) If not on the data set LTV.FLAT.DATA, the sample weights for each observation in LTV.FLAT.DATA and used to perform the analyses described in your testimony.**

RESPONSE:

(a) and (b) Docket No. R97-1, USPS LR-H-137 presents the requested data set, listing of properties, and descriptor/identifications. LTV.FLAT.DATA is stored on a floppy disk located on the back cover of this LR.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-2. Please refer to the FY1998 City Carrier Cost System. Please provide for each stop type (SDR, MDR, and BAM):

- (a) The estimated total annual number of actual and possible stops in the USPS system.
- (b) The estimated total annual number of actual and possible deliveries in the USPS system.
- (c) The average possible stops coverage figure.
- (d) The average possible deliveries coverage figure.

RESPONSE:

- (a) Estimated total annual actual and possible stops by stop type are as follows:

STOP TYPE	ACTUAL STOPS	POSSIBLE STOPS	COVERAGE
SDR	12,802,475,000	13,774,754,000	92.94%
MDR	1,150,772,000	1,181,930,000	97.36%
BAM	1,288,917,000	1,433,325,000	89.92%

- (b) Estimated total annual actual and possible deliveries by stop type are as follows:

STOP TYPE	ACTUAL DELIVERIES	POSSIBLE DELIVERIES	COVERAGE
SDR	12,802,475,000	13,774,754,000	92.94%
MDR	7,419,487,000	8,933,328,000	83.05%
BAM	1,555,233,000	1,660,615,000	93.65%

- (c) The average possible stops coverage figure.

See the last column of the table presented in part (a).

- (d) The average possible deliveries coverage figure.

See the last column of the table presented in part (b).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

**MPA/USPS-T12-3. Please refer to the FY 1987 through FY 1997 City Cost System.
Please provide for each stop type:**

- (a) The estimated total annual number of actual and possible stops in the USPS system.**
- (b) The estimated total annual number of actual and possible deliveries in the USPS system.**
- (c) The average possible stops coverage figure.**
- (e) The average possible deliveries coverage figure.**

RESPONSE:

I haven't performed this analysis.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-4. Please refer to Library Reference LR H 58. Please provide:

- (a) The data sets CURBSAS, FOOTAS, and LOOPSAS in PC-readable form (i.e., either on Compact Disk or 3 0 inch floppies), a listing of their properties, and a descriptor/identification for each of their fields.
- (b) If not on each of the data sets, the sample weights for each observation in those data sets and used to perform the analyses described in your testimony.

RESPONSE:

(a) and (b) These data sets have been copied into the PC-readable files CURB.DATA, FOOT.DATA, and LOOP.DATA, and are stored on diskettes. These diskettes have been included as part of a new library reference, USPS LR-I-218, to be filed shortly.

(b) I am unaware of any sample weights.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-5. Please refer to Library Reference LR I-159. As to the National System of City Routes, please list all the other data variables, by route, contained in ALDRAN.HQ059TOI .CITY,PQ4FY97.

RESPONSE:

- | | |
|---------|---|
| FIN_NO | - Finance number to which the route is assigned. |
| PO_NAME | - Name of the post office, i.e. finance number, to which the route is assigned. |
| POZIP | - ZIP Code in which the route's post office is located. |
| AREA | - Code identifying the area in which the route's finance number is located. |
| CAG | - The Cost Ascertainment Group to which the route's finance number is assigned. |
| AUXIND | - A one character code that is equal to 'Y' if the route is an auxiliary route, and 'N' otherwise. An auxiliary route is a part-time route. |
| BFBOX | - The number of business deliveries on the route that are made to post office boxes that are located in postal facilities. |
| DROPCNT | - The count of mail drop points on the route. |

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-6. Question: Please refer to Library Reference LR I-159. As to the National System of City Routes, please provide the following for the USPS total system of routes, separately for each of the ten regions:

(a) In PQ4 FY97, number of 3-D zips and, separately, 5-D zips with city carrier routes.

(b) Per ALDRAN.HQ059TOI .CITY,PQ4FY97, number of city carrier routes where the primary mode of delivery is:

- Foot
- Park & Loop
- Curbline
- Dismount
- Other
- Cannot be determined.

(c) Number of city carrier routes in ALDRAN.HQ059TOI.PQ4FY97 classified by ES.CNTL as:

- Foot
- Park & Loop
- Curbline
- Dismount
- Other
- Cannot be determined.

(d) As to each route delivery mode category in the previous subsection, please provide also, the average number of:

- Residential curb deliveries
- Residential NDCBU deliveries
- Residential centralized deliveries
- Residential other deliveries
- Business curb deliveries
- Business NDCBU deliveries
- Business centralized deliveries
- Business other deliveries.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-6(e). As to each route type listed in the previous subsection, please provide also the number of possible:

- Residential curb deliveries
- Residential NDCBU deliveries
- Residential centralized deliveries
- Residential other deliveries
- Business curb deliveries
- Business NDCBU deliveries
- Business centralized
- Business other deliveries.

RESPONSE:

(a)

NUMBER OF 3-D ZIPS WITH CITY ROUTES BY AREA		
AREA	AREA NAME	NUMBER OF 3-D ZIP CODES WITH CITY ROUTES
A	New York Metro	43
B	Northeast	84
C	Allegheny	86
D	Mid-Atlantic	98
E	Western	110
F	Pacific	59
G	Southwest	91
H	Southeast	92
I	Midwest	142
J	Great Lakes	56
K	Capital Metro	22
TOTAL		883

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

NUMBER OF 5-D ZIP CODES WITH CITY ROUTES BY AREA		
AREA	AREA NAME	NUMBER OF 5-D ZIP CODES WITH CITY ROUTES
A	New York Metro	909
B	Northeast	979
C	Allegheny	1,359
D	Mid-Atlantic	810
E	Western	969
F	Pacific	1,047
G	Southwest	1,297
H	Southeast	1,395
I	Midwest	1,467
J	Great Lakes	1,009
K	Capital Metro	266
TOTAL		11,507

(b)

NUMBER OF CITY ROUTES BY AREA AND DELIVERY MODE			
AREA	AREA NAME	DELIVERY MODE	NUMBER OF CITY ROUTES
A	New York Metro	Curbline	1,638
A	New York Metro	Dismount	436
A	New York Metro	Foot	5,871
A	New York Metro	Other	65
A	New York Metro	Park & Loop	6,646
B	Northeast	Curbline	2,050
B	Northeast	Dismount	1,010
B	Northeast	Foot	2,445
B	Northeast	Other	70
B	Northeast	Park & Loop	8,182
C	Allegheny	Curbline	3,271
C	Allegheny	Dismount	473
C	Allegheny	Foot	2,988
C	Allegheny	Other	111
C	Allegheny	Park & Loop	11,386
D	Mid-Atlantic	Curbline	2,707
D	Mid-Atlantic	Dismount	879
D	Mid-Atlantic	Foot	534
D	Mid-Atlantic	Other	112
D	Mid-Atlantic	Park & Loop	4,290
E	Western	Curbline	4,330
E	Western	Dismount	3,967
E	Western	Foot	991
E	Western	Other	454
E	Western	Park & Loop	5,604

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

NUMBER OF CITY ROUTES BY AREA AND DELIVERY MODE			
AREA	AREA NAME	DELIVERY MODE	NUMBER OF CITY ROUTES
F	Pacific	Curbline	3,708
F	Pacific	Dismount	4,182
F	Pacific	Foot	1,569
F	Pacific	Other	219
F	Pacific	Park & Loop	14,461
G	Southwest	Curbline	4,342
G	Southwest	Dismount	2,483
G	Southwest	Foot	171
G	Southwest	Other	19
G	Southwest	Park & Loop	8,613
H	Southeast	Curbline	7,270
H	Southeast	Dismount	3,989
H	Southeast	Foot	424
H	Southeast	Other	140
H	Southeast	Park & Loop	5,935
I	Midwest	Curbline	3,191
I	Midwest	Dismount	417
I	Midwest	Foot	1,548
I	Midwest	Other	129
I	Midwest	Park & Loop	9,753
J	Great Lakes	Curbline	3,438
J	Great Lakes	Dismount	653
J	Great Lakes	Foot	1,802
J	Great Lakes	Other	199
J	Great Lakes	Park & Loop	11,107
K	Capital Metro	Curbline	767
K	Capital Metro	Dismount	663
K	Capital Metro	Foot	772
K	Capital Metro	Other	158
K	Capital Metro	Park & Loop	3,475
TOTAL			166,107

(c) ES.CNTL does not define route types as described in this interrogatory. The following route types are defined in ES.CNTL.

- Foot
- Residential Park & Loop and Mixed Park & Loop
- Residential Curb and Mixed Curb
- Business Motorized

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

The following answer is based upon these route types:

NUMBER OF ROUTES BY AREA AND ROUTE TYPE			
AREA	AREA NAME	ROUTE TYPE	NUMBER OF ROUTES
A	New York Metro	Foot	5,871
A	New York Metro	Residential Loop	6,206
A	New York Metro	Residential Curb	1,885
A	New York Metro	Mixed Loop	367
A	New York Metro	Mixed Curb	164
A	New York Metro	Business Motorized	163
B	Northeast	Foot	2,445
B	Northeast	Residential Loop	7,745
B	Northeast	Residential Curb	2,832
B	Northeast	Mixed Loop	376
B	Northeast	Mixed Curb	216
B	Northeast	Business Motorized	143
C	Allegheny	Foot	2,988
C	Allegheny	Residential Loop	10,820
C	Allegheny	Residential Curb	3,508
C	Allegheny	Mixed Loop	461
C	Allegheny	Mixed Curb	228
C	Allegheny	Business Motorized	224
D	Mid-Atlantic	Foot	534
D	Mid-Atlantic	Residential Loop	3,939
D	Mid-Atlantic	Residential Curb	3,329
D	Mid-Atlantic	Mixed Loop	297
D	Mid-Atlantic	Mixed Curb	297
D	Mid-Atlantic	Business Motorized	126
E	Western	Foot	991
E	Western	Residential Loop	5,155
E	Western	Residential Curb	7,823
E	Western	Mixed Loop	366
E	Western	Mixed Curb	522
E	Western	Business Motorized	489
F	Pacific	Foot	1,569
F	Pacific	Residential Loop	13,048
F	Pacific	Residential Curb	7,159
F	Pacific	Mixed Loop	1,090
F	Pacific	Mixed Curb	663
F	Pacific	Business Motorized	610
G	Southwest	Foot	171
G	Southwest	Residential Loop	7,902
G	Southwest	Residential Curb	5,955
G	Southwest	Mixed Loop	560
G	Southwest	Mixed Curb	545
G	Southwest	Business Motorized	495

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

NUMBER OF ROUTES BY AREA AND ROUTE TYPE (Continued)			
AREA	AREA NAME	ROUTE TYPE	NUMBER OF ROUTES
H	Southeast	Foot	424
H	Southeast	Residential Loop	5,190
H	Southeast	Residential Curb	10,274
H	Southeast	Mixed Loop	563
H	Southeast	Mixed Curb	821
H	Southeast	Business Motorized	486
I	Midwest	Foot	1,548
I	Midwest	Residential Loop	9,163
I	Midwest	Residential Curb	3,425
I	Midwest	Mixed Loop	455
I	Midwest	Mixed Curb	193
I	Midwest	Business Motorized	254
J	Great Lakes	Foot	1,802
J	Great Lakes	Residential Loop	10,521
J	Great Lakes	Residential Curb	3,849
J	Great Lakes	Mixed Loop	471
J	Great Lakes	Mixed Curb	320
J	Great Lakes	Business Motorized	236
K	Capital Metro	Foot	772
K	Capital Metro	Residential Loop	3,219
K	Capital Metro	Residential Curb	1,447
K	Capital Metro	Mixed Loop	214
K	Capital Metro	Mixed Curb	87
K	Capital Metro	Business Motorized	96
TOTAL			166,107

(d)

AVERAGE NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE						
AREA	AREA NAME	DELIVERY MODE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Curbline	353	19	31	48
A	New York Metro	Dismount	76	38	79	139
A	New York Metro	Foot	3	366	6	181
A	New York Metro	Other	198	156	45	272
A	New York Metro	Park & Loop	23	62	26	286
B	Northeast	Curbline	312	24	23	43
B	Northeast	Dismount	66	58	33	178
B	Northeast	Foot	1	120	7	231
B	Northeast	Other	25	80	21	54
B	Northeast	Park & Loop	28	64	18	293
C	Allegheny	Curbline	315	32	36	47
C	Allegheny	Dismount	80	79	77	152
C	Allegheny	Foot	10	77	7	341
C	Allegheny	Other	55	45	28	118
C	Allegheny	Park & Loop	36	58	19	315

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

AVERAGE NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE (Continued)						
AREA	AREA NAME	DELIVERY MODE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
D	Mid-Atlantic	Curbline	360	47	61	50
D	Mid-Atlantic	Dismount	121	101	79	151
D	Mid-Atlantic	Foot	113	49	49	230
D	Mid-Atlantic	Other	183	117	152	86
D	Mid-Atlantic	Park & Loop	62	60	51	307
E	Western	Curbline	308	72	96	49
E	Western	Dismount	44	123	135	154
E	Western	Foot	71	95	59	184
E	Western	Other	45	154	107	120
E	Western	Park & Loop	48	85	45	272
F	Pacific	Curbline	321	40	59	54
F	Pacific	Dismount	62	124	128	142
F	Pacific	Foot	23	189	19	170
F	Pacific	Other	97	138	83	76
F	Pacific	Park & Loop	20	123	32	260
G	Southwest	Curbline	364	66	56	42
G	Southwest	Dismount	61	242	105	66
G	Southwest	Foot	10	25	20	249
G	Southwest	Other	46	221	35	187
G	Southwest	Park & Loop	42	87	29	313
H	Southeast	Curbline	390	49	51	37
H	Southeast	Dismount	85	227	107	89
H	Southeast	Foot	96	105	32	170
H	Southeast	Other	144	115	78	81
H	Southeast	Park & Loop	79	108	47	237
I	Midwest	Curbline	303	53	48	35
I	Midwest	Dismount	67	164	70	66
I	Midwest	Foot	28	68	14	272
I	Midwest	Other	75	77	19	109
I	Midwest	Park & Loop	42	73	21	295
J	Great Lakes	Curbline	320	41	38	32
J	Great Lakes	Dismount	67	140	83	64
J	Great Lakes	Foot	12	151	6	223
J	Great Lakes	Other	78	47	46	122
J	Great Lakes	Park & Loop	27	85	13	288
K	Capital Metro	Curbline	267	21	51	27
K	Capital Metro	Dismount	36	241	121	62
K	Capital Metro	Foot	32	149	30	158
K	Capital Metro	Other	48	111	49	98
K	Capital Metro	Park & Loop	29	115	39	206

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

(d) Continued

AVERAGE NUMBER OF POSSIBLE BUSINESS DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE						
AREA	AREA NAME	DELIVERY MODE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
A	New York Metro	Curbline	5	1	3	21
A	New York Metro	Dismount	2	4	4	52
A	New York Metro	Foot	0	3	0	50
A	New York Metro	Other	2	4	1	45
A	New York Metro	Park & Loop	0	2	1	30
B	Northeast	Curbline	6	2	2	14
B	Northeast	Dismount	2	5	3	39
B	Northeast	Foot	0	5	1	39
B	Northeast	Other	1	10	1	14
B	Northeast	Park & Loop	1	2	1	30
C	Allegheny	Curbline	8	1	2	18
C	Allegheny	Dismount	4	4	5	61
C	Allegheny	Foot	0	2	1	42
C	Allegheny	Other	1	6	2	48
C	Allegheny	Park & Loop	1	1	1	29
D	Mid-Atlantic	Curbline	10	1	3	24
D	Mid-Atlantic	Dismount	6	7	4	69
D	Mid-Atlantic	Foot	2	2	1	64
D	Mid-Atlantic	Other	11	6	9	57
D	Mid-Atlantic	Park & Loop	3	2	2	45
E	Western	Curbline	9	2	6	19
E	Western	Dismount	2	4	7	35
E	Western	Foot	3	6	5	55
E	Western	Other	2	7	14	25
E	Western	Park & Loop	2	3	3	32
F	Pacific	Curbline	5	2	6	16
F	Pacific	Dismount	3	6	11	40
F	Pacific	Foot	0	8	3	62
F	Pacific	Other	2	13	13	37
F	Pacific	Park & Loop	1	4	3	34
G	Southwest	Curbline	7	2	4	25
G	Southwest	Dismount	4	14	8	57
G	Southwest	Foot	0	8	1	83
G	Southwest	Other	1	9	0	91
G	Southwest	Park & Loop	2	3	2	43
H	Southeast	Curbline	9	2	5	26
H	Southeast	Dismount	3	8	9	43
H	Southeast	Foot	3	7	4	63
H	Southeast	Other	7	9	7	52
H	Southeast	Park & Loop	3	5	3	48

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

AVERAGE NUMBER OF POSSIBLE BUSINESS DELIVERIES PER ROUTE BY AREA AND DELIVERY MODE (Continued)						
AREA	AREA NAME	DELIVERY MODE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
I	Midwest	Curbline	6	2	2	19
I	Midwest	Dismount	3	7	3	57
I	Midwest	Foot	1	3	1	54
I	Midwest	Other	2	4	1	38
I	Midwest	Park & Loop	2	2	1	34
J	Great Lakes	Curbline	10	2	2	20
J	Great Lakes	Dismount	7	6	3	48
J	Great Lakes	Foot	1	3	1	48
J	Great Lakes	Other	6	5	2	18
J	Great Lakes	Park & Loop	2	1	1	29
K	Capital Metro	Curbline	2	1	2	15
K	Capital Metro	Dismount	1	3	3	27
K	Capital Metro	Foot	1	4	1	41
K	Capital Metro	Other	1	3	2	32
K	Capital Metro	Park & Loop	1	1	1	25

(e) As noted in subsection (c), above, ES.CNTL does not define route types as described in this interrogatory. The following route types are defined in ES.CNTL.

- Foot
- Residential Park & Loop and Mixed Park & Loop
- Residential Curb and Mixed Curb
- Business Motorized

The following answer is based upon these route types:

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Foot	15,182	2,149,442	35,656	1,060,072
A	New York Metro	Residential Loop	146,625	403,336	170,740	1,850,495
A	New York Metro	Residential Curb	605,626	54,412	83,577	150,590
A	New York Metro	Mixed Loop	5,887	11,198	4,785	50,475
A	New York Metro	Mixed Curb	18,507	2,905	3,897	6,087

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
A	New York Metro	Business Motorized	793	500	150	1,584
B	Northeast	Foot	3,569	293,461	16,342	564,719
B	Northeast	Residential Loop	224,495	500,662	144,621	2,350,339
B	Northeast	Residential Curb	689,978	105,308	78,932	257,201
B	Northeast	Mixed Loop	6,702	21,042	4,880	48,172
B	Northeast	Mixed Curb	17,689	7,223	3,059	13,652
B	Northeast	Business Motorized	656	775	286	1,417
C	Allegheny	Foot	31,094	230,205	22,371	1,020,270
C	Allegheny	Residential Loop	402,434	640,354	215,600	3,531,011
C	Allegheny	Residential Curb	1,053,080	140,612	151,725	228,620
C	Allegheny	Mixed Loop	11,417	22,802	5,417	57,093
C	Allegheny	Mixed Curb	21,265	6,943	4,814	9,124
C	Allegheny	Business Motorized	1,230	502	46	1,693
D	Mid-Atlantic	Foot	60,184	26,357	26,087	122,667
D	Mid-Atlantic	Residential Loop	256,375	243,649	209,764	1,271,769
D	Mid-Atlantic	Residential Curb	1,072,196	214,431	238,975	256,874
D	Mid-Atlantic	Mixed Loop	9,240	12,817	8,204	44,884
D	Mid-Atlantic	Mixed Curb	29,335	13,466	13,093	19,845
D	Mid-Atlantic	Business Motorized	803	1,127	390	1,439
E	Western	Foot	70,254	94,110	58,191	181,869
E	Western	Residential Loop	259,961	452,101	245,963	1,479,582
E	Western	Residential Curb	1,494,313	830,992	974,284	844,343
E	Western	Mixed Loop	10,096	24,828	8,651	45,699
E	Western	Mixed Curb	30,726	36,562	23,768	31,298
E	Western	Business Motorized	1,950	2,302	1,024	3,326
F	Pacific	Foot	36,109	296,309	29,798	266,889

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
F	Pacific	Residential Loop	272,420	1,699,032	451,201	3,632,090
F	Pacific	Residential Curb	1,421,799	652,120	747,487	765,773
F	Pacific	Mixed Loop	17,230	82,612	18,401	130,235
F	Pacific	Mixed Curb	48,677	41,540	25,461	40,763
F	Pacific	Business Motorized	1,803	3,235	1,065	4,719
G	Southwest	Foot	1,710	4,314	3,405	42,572
G	Southwest	Residential Loop	352,422	717,600	244,549	2,604,863
G	Southwest	Residential Curb	1,690,876	844,689	488,045	316,355
G	Southwest	Mixed Loop	12,294	33,875	7,174	88,180
G	Southwest	Mixed Curb	40,819	44,186	14,315	29,416
G	Southwest	Business Motorized	2,373	2,080	1,014	4,565
H	Southeast	Foot	40,750	44,485	13,457	72,167
H	Southeast	Residential Loop	440,764	606,160	265,931	1,347,272
H	Southeast	Residential Curb	3,094,629	1,228,065	782,719	594,208
H	Southeast	Mixed Loop	28,460	32,958	12,463	60,139
H	Southeast	Mixed Curb	93,421	46,375	29,060	38,401
H	Southeast	Business Motorized	3,890	2,375	916	3,242
I	Midwest	Foot	43,426	105,840	21,371	421,436
I	Midwest	Residential Loop	399,364	689,560	199,155	2,821,089
I	Midwest	Residential Curb	986,364	237,705	180,719	148,324
I	Midwest	Mixed Loop	10,172	25,847	5,600	59,265
I	Midwest	Mixed Curb	17,007	9,301	4,866	5,170
I	Midwest	Business Motorized	658	716	52	814

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

TOTAL NUMBER OF POSSIBLE RESIDENTIAL DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	RESIDENTIAL CURB	RESIDENTIAL CENTRALIZED	RESIDENTIAL NDCBU	RESIDENTIAL OTHER
J	Great Lakes	Foot	21,873	271,741	11,238	401,499
J	Great Lakes	Residential Loop	294,655	916,556	140,554	3,139,346
J	Great Lakes	Residential Curb	1,125,373	231,512	187,205	164,506
J	Great Lakes	Mixed Loop	10,298	22,132	3,714	54,687
J	Great Lakes	Mixed Curb	33,597	10,969	5,704	10,388
J	Great Lakes	Business Motorized	1,112	624	39	903
K	Capital Metro	Foot	24,351	115,379	23,430	122,152
K	Capital Metro	Residential Loop	94,234	391,118	131,760	696,736
K	Capital Metro	Residential Curb	229,683	188,667	124,839	74,048
K	Capital Metro	Mixed Loop	5,479	8,132	5,113	16,972
K	Capital Metro	Mixed Curb	6,249	5,085	2,243	2,779
K	Capital Metro	Business Motorized	308	112	66	770
TOTAL			17,456,311	16,157,430	6,939,421	33,688,942

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
A	New York Metro	Foot	220	16,569	1,789	292,148
A	New York Metro	Residential Loop	2,083	6,188	4,595	139,722
A	New York Metro	Residential Curb	5,725	1,797	3,265	30,505
A	New York Metro	Mixed Loop	700	3,204	1,991	45,443
A	New York Metro	Mixed Curb	2,188	1,438	2,250	18,140
A	New York Metro	Business Motorized	725	1,904	1,060	22,386
B	Northeast	Foot	164	12,216	1,583	94,860
B	Northeast	Residential Loop	7,354	12,257	7,327	196,256
B	Northeast	Residential Curb	10,795	4,263	4,724	43,085
B	Northeast	Mixed Loop	2,262	6,009	2,860	43,833
B	Northeast	Mixed Curb	3,635	3,527	3,027	20,090
B	Northeast	Business Motorized	746	3,311	1,172	13,978
C	Allegheny	Foot	830	5,025	2,023	125,790
C	Allegheny	Residential Loop	13,907	6,797	6,746	267,380
C	Allegheny	Residential Curb	22,920	3,116	6,382	56,652
C	Allegheny	Mixed Loop	1,969	3,232	1,704	56,343
C	Allegheny	Mixed Curb	3,287	2,283	2,798	23,607
C	Allegheny	Business Motorized	839	2,071	704	25,216
D	Mid-Atlantic	Foot	1,090	1,077	538	34,041
D	Mid-Atlantic	Residential Loop	9,445	3,919	5,093	138,735
D	Mid-Atlantic	Residential Curb	26,666	4,073	8,240	79,722
D	Mid-Atlantic	Mixed Loop	2,544	2,415	2,739	46,142
D	Mid-Atlantic	Mixed Curb	5,467	4,579	3,708	41,150
D	Mid-Atlantic	Business Motorized	533	3,061	1,324	21,238

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
E	Western	Foot	3,259	5,760	4,498	54,206
E	Western	Residential Loop	9,725	7,574	10,192	119,006
E	Western	Residential Curb	33,554	13,131	35,512	129,810
E	Western	Mixed Loop	3,035	5,013	4,608	52,128
E	Western	Mixed Curb	9,237	7,495	15,890	59,330
E	Western	Business Motorized	4,055	11,916	9,067	54,418
F	Pacific	Foot	753	13,158	4,574	97,414
F	Pacific	Residential Loop	5,532	26,129	23,372	299,247
F	Pacific	Residential Curb	19,806	14,287	36,380	119,076
F	Pacific	Mixed Loop	1,822	19,496	17,116	139,830
F	Pacific	Mixed Curb	7,293	11,961	24,304	77,789
F	Pacific	Business Motorized	2,836	15,866	14,820	84,555
G	Southwest	Foot	35	1,405	146	14,135
G	Southwest	Residential Loop	12,524	12,215	10,340	267,686
G	Southwest	Residential Curb	31,405	14,660	21,811	149,943
G	Southwest	Mixed Loop	2,566	7,024	4,233	83,938
G	Southwest	Mixed Curb	7,278	12,670	11,505	63,896
G	Southwest	Business Motorized	1,497	22,983	6,126	55,715
H	Southeast	Foot	1,317	3,092	1,586	26,903
H	Southeast	Residential Loop	12,180	11,984	9,936	182,301
H	Southeast	Residential Curb	59,595	20,379	40,102	241,802
H	Southeast	Mixed Loop	3,349	10,186	5,075	79,768
H	Southeast	Mixed Curb	12,584	15,199	22,058	97,148
H	Southeast	Business Motorized	3,991	18,868	10,098	54,463
I	Midwest	Foot	1,236	4,136	1,061	83,026
I	Midwest	Residential Loop	14,875	9,006	6,652	260,888
I	Midwest	Residential Curb	18,747	4,334	5,320	59,823
I	Midwest	Mixed	2,268	5,870	2,405	57,690
I	Midwest	Mixed Curb	2,701	2,354	1,952	18,273
I	Midwest	Business Motorized	659	3,779	1,000	21,011
J	Great Lakes	Foot	1,162	4,601	931	85,965
J	Great Lakes	Residential Loop	14,089	10,117	4,799	264,558

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

TOTAL NUMBER OF POSSIBLE BUSINESS DELIVERIES BY AREA AND ROUTE TYPE (Continued)						
AREA	AREA NAME	ROUTE TYPE	BUSINESS CURB	BUSINESS CENTRALIZED	BUSINESS NDCBU	BUSINESS OTHER
J	Great Lakes	Residential Curb	30,384	5,820	6,341	66,190
J	Great Lakes	Mixed Loop	2,920	4,908	1,868	50,475
J	Great Lakes	Mixed Curb	6,912	3,176	2,748	30,373
J	Great Lakes	Business Motorized	1,595	2,662	536	18,431
K	Capital Metro	Foot	466	2,789	814	31,449
K	Capital Metro	Residential Loop	1,630	2,691	1,640	56,331
K	Capital Metro	Residential Curb	1,882	1,260	2,304	20,790
K	Capital Metro	Mixed Loop	436	1,815	1,212	24,060
K	Capital Metro	Mixed Curb	405	1,128	1,225	8,747
K	Capital Metro	Business Motorized	18	1,322	655	10,201
TOTAL			477,707	488,550	464,454	5,649,250

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-8. Please confirm that ALDRAN.FOS.STS.SAS.DATA contains observations taken during PQs 1, 2, and 3 of PFY 1996 and PQs 1 and 2 of PFY 1998. If this is incorrect, please identify the period over which the data set was collected.

RESPONSE:

Not confirmed. ALDRAN.FOS.STS.DATA contains observations taken from PFY 1997

– QTR 1 through PFY 1998 – QTR 3.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-9. Please refer to your Testimony at page 13, lines 2-4, at which you reject the Crowder analysis "precisely because $g(V/S)$ is a very poor approximation of \bar{L} due to substantial non-linearity in the load-time regressions." Please identify which load-time regressions are being referred to here and who performed these regressions, on which data and when.

RESPONSE:

The load-time regressions being referred to are the regressions estimated by the Postal Rate Commission in Docket No. R90-1, PRC Lib Ref 9, Analysis of Variability for City Delivery Carrier Street Load Time (Part III of III), Workpaper 5. The Commission used data from the LTV.FLAT.DATA file referred to in question 1 to produce the regressions. These data were obtained from the 1985 load time test.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-10. Please refer to your Testimony at page 13, lines 2-4. Please provide precise scientific definitions for the following expressions, in terms of statistical methods and measurement:

(a) $g(V/S)$ is a "very poor approximation."

(b) "substantial non-linearity."

RESPONSE:

(a) In its Docket No. R97-1 Decision at page 179, paragraph 3284, the Postal Rate Commission stated:

It is true that models that use average values for the independent variable under investigation are only approximations of models that attempt to account for the specific distribution pattern of the independent variable across a sample. They are **close approximations**, however, where the function is well behaved. The elemental variability function is such a function.

I have added emphasis to the words "close approximations" in this quotation. My intended definition of the term "close approximation" is the same definition that the Commission is using in this quotation. Since the Commission did not explicitly state a definition based on "statistical methods and measurement," I infer that it was choosing to apply the common dictionary definition of the term "close approximation."

Accordingly, I choose to interpret "close approximation" as meaning "almost identical" or "almost equal."¹

The reason this is important is that I also interpret the term "very poor approximation" as meaning "**not** a close approximation," or "nowhere near a close approximation." Thus, my statement that $g(V/S)$ is a very poor approximation of \bar{L} is a

¹ The American Heritage Dictionary of the English Language, s.v. "approximate."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

statement that $g(V/S)$ is not a close approximation of \bar{L} , meaning, specifically, that $g(V/S)$ is **not** almost identical to, or **not** almost equal to \bar{L} .

(b) Within the context of my statement in lines 2-4 at page 13 of my Testimony, the non-linearity of each regression equation means that in the neighborhood of $(\bar{V}_L, \bar{V}_F, \bar{V}_P, \bar{V}_C)$, where \bar{V}_L is average letters per stop, \bar{V}_F is average flats per stop, \bar{V}_P is average parcels per stop, and \bar{V}_C is average collections per stop, and where $g(V/S)$ can be viewed as load time predicted at these average volumes per stop, the regression is strictly concave or strictly convex. Linear equations are, by definition, neither strictly concave nor strictly convex. Substantial non-linearity means that the degree of the strict concavity or convexity is too large to justify concluding that there is no strict concavity or strict convexity. For definitions of strict concavity and convexity, see Alpha C. Chang, Fundamental Methods of Mathematical Economics, McGraw-Hill Book Company, 3rd Edition, 1984, at 340-348. The concept of a neighborhood as used in my reference to a neighborhood of $(\bar{V}_L, \bar{V}_F, \bar{V}_P, \bar{V}_C)$ is the same concept as that used by Alpha C. Chang at page 206 of this citation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-11. Please refer to your Testimony at page 16, lines 8-9. Please

confirm that your statement that: " The more \bar{L} deviates from $\hat{g}(V/S)$, the greater is the non-linearity" appears to ignore the usual data validity and probability measurement concerns of regression analysis. If you do not confirm, please explain why.

RESPONSE:

I cannot answer, as I do not know precisely what is meant by "the usual data validity and probability measurement concerns of regression analysis" in this context.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-12. Please identify what your usual statistical acceptance "rules of thumb" are for test statistics in your econometric/regression work for the USPS, for:

- (a) F-test**
- (b) t-test**
- (c) adjusted coefficient of determination, and**
- (f) other relevant test statistics (please list).**

RESPONSE:

- (a) An *F* value that is high enough to fall within the upper 5% tail of the *F* distribution is sufficiently high to justify rejection of the null hypothesis that the coefficients of the relevant set of regressors being tested are jointly zero.**
- (b) A *t* value that is high enough to fall within the upper or lower 5% tails of the *t* distribution is sufficient to justify rejection of the null hypothesis that the coefficient of the regressor being tested is zero.**
- (c) I do not recognize any "rule of thumb" regarding the adjusted coefficient of determination. Sometimes analysts use regressions with low adjusted coefficients of determination. They may regard these regressions as valid because the estimated coefficients for the regressors in the model have very high *t* statistics, and because the missing variables that would explain the large unexplained variation still remaining are considered to be uncorrelated with the existing regressors. Conversely, analysts sometimes reject regressions that have high adjusted coefficients of determination. They may do so because they regard the estimated coefficients for the regressors that are most critical to their investigation as**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

counterintuitive, operationally indefensible, or statistically unreliable. There may be other reasons as well.

(d) I cannot answer without further specification of the other relevant statistics for which you want me to provide rules of thumb.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-13. Please refer to your Testimony at page 17, lines 13-15, where you describe a 2.61% discrepancy between \tilde{L} and $\hat{g}(V/S)$ as being a liberal interpretation of the linearity assumption. Please state what you would have considered a "good fit" (e.g. 1.00%), and why.

RESPONSE:

As I also observed at page 17, lines 13-15 of my Testimony, the 2.61% discrepancy equates to a \$21,000,000 discrepancy. I would regard a discrepancy of less than \$1,000,000 as small enough to justify interpreting the regression as a sufficiently close approximation to a linear equation to justify using it as such.

This choice of \$1,000,000 as the cutoff point is strictly my professional judgment.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-TI2-14. Please refer to your Testimony at page 26 and footnote 35. If you were to eliminate the RUNUM variable from the quadratic equation (12), how would you expect the elasticities, t-statistics and other test results to change, if at all?

RESPONSE:

It is not clear whether the premise of this question is that I would (1) first eliminate the RUNUM variable and then reestimate the regression on the remaining regressors, or (2) view those RUNUM coefficients that have high standard errors as equaling zero, and then recalculate elasticities using the remaining regression terms, as currently estimated. Footnote 35 on page 26 of my Testimony discusses only the second of these two options. Under this second premise, the t-statistics and other test results would not change; the elasticities would change by very small amounts.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-15. Please state whether a test run such as that mentioned in question 14 has been performed by you or others on either quadratic (12) or interaction model (13). If affirmative, please state what the results were and they affected the elasticity estimates.

RESPONSE:

Having assumed that the second premise of my answer to question 14 is correct, I reestimated the elasticities after setting "high-standard-error" RUNUM coefficients equal to zero. The new elasticity estimates are shown in the table below next to my proposed elasticity estimates, which are the ones presented in Docket No. R97-1, USPS-T-17 at page 62 and USPS LR-H-141 at pages 13, 56, and 77. Observe that new estimates are calculated for only curb and foot routes. Since all the RUNUM coefficients in the park & loop equation are statistically significant, none of these coefficients is set equal to zero.

Route Group	Stop Type	Proposed Elasticity Estimates	Elasticity Estimates Derived After Setting RUNUM Coefficients with High Standard Errors Equal to Zero
CURB	SDR	.494	.492
CURB	MDR	.487	.484
CURB	BAM	.498	.495
FOOT	SDR	.596	.593
FOOT	MDR	.597	.595
FOOT	BAM	.598	.596

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-16. Please refer to your testimony at page 27, lines 17-19. Please state whether it is your view that the use of the variable $RUNUM_t * RTYPE_j$ is wholly responsible for the "negative, unrealistically low, or unrealistically high" route specific elasticities you describe, or whether there exist other factors besides equation design and variable choice that might be relevant here. If other factors besides equation design and variable choice are relevant, please state which factors and why.

RESPONSE:

I believe the reason numerous route-specific elasticities are operationally implausible is that the interactions model uses only five or fewer data points to estimate a separate set of three regression coefficients for each individual route – one coefficient for the intercept, one for the STOPS variable, and one for the $STOPS^2$ variable. The substantial loss of degrees of freedom resulting from this use of only five or fewer data points per set of three coefficients virtually guarantees unstable and imprecise coefficient estimates. This imprecision is, in turn, translated into highly unreliable estimates for the route-specific derivatives and running times, and for the elasticities derived from those derivatives and running times.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPAIUSPS-T12-17. Please state whether the curious range of elasticity estimates from the interactive equation (13) results arise from errors in the data collected from one-third of the MDR stops surveyed, or some other data collection/cleaning problems at the micro level.

RESPONSE:

The curious range of elasticity estimates results from a methodology that uses only five or fewer data points to estimate three regression parameters for each of 161 curblane routes, 77 foot routes, and 199 park & loop routes. As noted in my response to question 16, these three parameters are the route-specific intercept, STOPS, and STOPS² coefficients.

Specifically, the interactions model uses only five data points to estimate this three-coefficient parameter set for each of 76 out of a total of 77 foot routes. For the 77th foot route, it uses only four data points to estimate the parameter set. Similarly, the interactions model uses five data points to estimate this parameter set for each of 197 out of 199 park & loop routes. For the 198th and 199th park & loop route, it again uses only four data points to estimate the parameter set. Finally, the interactions model uses five data points to estimate the parameter set for each of 161 curblane routes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-18. Please refer to your Testimony at page 33, footnote 43, at which you state that: "the A.T. Kearney study recommended that the Postal Service consider using these data to update its segment 7 cost analysis." Please state whether you are referring to recommendation 12 on page 56 of the Data Quality Study, Technical Report #4, April 16, 1999. If affirmative, please specify your interpretation of this recommendation.

RESPONSE:

I am referring to the recommendations made on pages 55-56 of the Data Quality Study, Technical Report # 4, April 16, 1999. These recommendations include, but are not limited to the recommendation 12 on page 56. I am interpreting the entire discussion on pages 55 and 56 as constituting a proposal that the Postal Service seriously consider using the Delivery Redesign data in its Segment 7 cost analyses as soon as those data become available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-19. Please state whether you have reviewed the process by which the Engineered Standards/Delivery Redesign project chose which city routes from which to collect data.

RESPONSE:

I have reviewed this process to the extent that I have read Mr. Raymond's testimony (USPS-T-13) and supporting documentation that were filed as part of Docket No.

R2000-1.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-20. Please refer to your Testimony at page 35, lines 4-6, at which you state that your weighting of the observations for each ES route "ensures that each ES route properly represents the ZIP code from which it was selected."

- (a)** Please provide all information available to demonstrate that the ZIP codes observed are representative of the entire system of routes.
- (b)** Please state whether you have attempted to develop sample weights for each of the observed ZIP codes. If affirmative, please explain all such attempts.

RESPONSE:

- (a)** The first two rows of the following table show two sets of average possible deliveries per route by delivery type category. The first set consists of average possible deliveries per route by delivery type just for the 336 ES routes within the 76 five-digit ZIP codes included in the ES database. The second set consists of average possible deliveries per route for all 166,107 routes in the FY 1997 – Qtr 4 Version of the Carrier Route Maintenance File (CRMF). The last two rows of the table show corresponding percentages. The percentage in each cell equals the ratio of average possible delivery for a given delivery type category over the sum of these averages over all such categories.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

Average Possible Deliveries Per Route by Delivery Type Category

Routes	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NCDBU	Business Centralized	Business Other
336 Sampled Routes in the ES Data Base	138	66	75	158	3	5	4	35
166,107 Routes in the FY 97 – Qtr 4 CRMF Data Base	105	42	97	203	3	3	3	34
336 Sampled Routes in the ES Data Base	28.5%	13.6%	15.5%	32.6%	0.7%	1.0%	0.9%	7.2%
166,107 Routes in the FY 97 – Qtr 4 CRMF Data Base	21.5%	8.5%	19.9%	41.4%	0.6%	0.6%	0.6%	6.9%

(b) I have not attempted to develop ZIP-Code level weights.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-21. As to each of the 76 5-D zips that were sampled to develop the new Engineered Standards (ES) database, please provide the zip code number and the USPS region within which it is located.

RESPONSE:

ZIP5	AREA	AREA NAME
731	A	New York Metro
8619	A	New York Metro
8629	A	New York Metro
8648	A	New York Metro
10019	A	New York Metro
1106	B	Northeast
1118	B	Northeast
1606	B	Northeast
19380	C	Allegheny
19382	C	Allegheny
45215	C	Allegheny
45241	C	Allegheny
45242	C	Allegheny
45249	C	Allegheny
23455	D	Mid-Atlantic
27408	D	Mid-Atlantic
89014	E	Western
89015	E	Western
98011	E	Western
98310	E	Western
98312	E	Western
98337	E	Western
90247	F	Pacific
90248	F	Pacific
90249	F	Pacific
91761	F	Pacific
91764	F	Pacific
94122	F	Pacific
94611	F	Pacific
96001	F	Pacific
96002	F	Pacific
96003	F	Pacific
72204	G	Southwest
75067	G	Southwest
75080	G	Southwest
75093	G	Southwest
75228	G	Southwest
76119	G	Southwest
78227	G	Southwest
78242	G	Southwest
30087	H	Southeast
31904	H	Southeast

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

ZIP5	AREA	AREA NAME
32304	H	Southeast
32310	H	Southeast
34616	H	Southeast
34621	H	Southeast
34624	H	Southeast
36201	H	Southeast
36207	H	Southeast
39206	H	Southeast
39216	H	Southeast
53208	I	Midwest
53214	I	Midwest
53223	I	Midwest
63301	I	Midwest
63303	I	Midwest
67209	I	Midwest
67212	I	Midwest
68114	I	Midwest
68124	I	Midwest
47803	J	Great Lakes
47804	J	Great Lakes
48035	J	Great Lakes
48036	J	Great Lakes
48043	J	Great Lakes
48044	J	Great Lakes
48045	J	Great Lakes
48184	J	Great Lakes
49201	J	Great Lakes
49202	J	Great Lakes
49203	J	Great Lakes
60606	J	Great Lakes
20003	K	Capital Metro
20024	K	Capital Metro
20737	K	Capital Metro
20782	K	Capital Metro

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-22. As to each of the ten regions, please provide the number of city carrier routes where the primary mode of delivery, per ES.CNTL is:

- (a) Foot**
- (c) Park & Loop**
- (d) Curbline**
- (c) Dismount**
- (d) Other**
- (e) Cannot be determined.**

RESPONSE:

Please see my response to MPA/USPS-T12-6 (b).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPAIUSPS-T12-23. As to each of the ten regions, please provide the number of city carrier routes, per ES.CNTL, classified as:

- (a) Foot**
- (b) Park & Loop**
- (c) Curbline**
- (d) Dismount**
- (e) Other**
- (f) Cannot be determined.**

RESPONSE:

Please see my response to MPA/USPS-T12-6(c).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-24. As to each of the route delivery modes described in question 22, please provide the average number of:

- (a) Residential curb deliveries
- (b) Residential NDCBU deliveries
- (c) Residential centralized deliveries
- (e) Residential other deliveries
- (f) Business curb deliveries
- (g) Business NDCBU deliveries
- (h) Business centralized deliveries
- (i) Business other deliveries.

RESPONSE:

Delivery Mode	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NDCBU	Business Centralized	Business Other
Curbline	339	53	47	42	8	4	2	21
Dismount	66	110	158	119	3	8	7	44
Foot	18	14	190	224	1	1	4	49
Other	81	73	114	110	3	7	7	34
Park & Loop	37	28	85	284	1	2	2	34

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-25. As to each route type identified by you in response to question number 23, please also provide the average number of possible:

- (a) Residential curb deliveries**
- (b) Residential NDCBU deliveries**
- (c) Residential centralized deliveries**
- (d) Residential other deliveries**
- (e) Business curb deliveries**
- (f) Business NDCBU deliveries**
- (g) Business centralized deliveries**
- (h) Business other deliveries.**

RESPONSE:

Route Type	Residential Curb	Residential NDCBU	Residential Centralized	Residential Other	Business Curb	Business NDCBU	Business Centralized	Business Other
Foot	18	14	190	224	1	1	4	49
Residential Loop	38	29	88	298	1	1	1	26
Residential Curb	262	78	92	74	5	3	2	19
Mixed Loop	24	16	57	126	5	9	13	130
Mixed Curb	88	32	55	51	15	23	16	113
Business Motorized	5	2	4	7	5	14	26	115

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-26. As to each of the 340 ES routes sampled, please provide

(a) the appropriate "unit code," as used on the LR I-163 ES database;

(b) the USPS region in which it is located;

(c) per ES.CNTL, the number of possible:

- . Residential curb deliveries
- . Residential NDCBU deliveries
- . Residential centralized deliveries
- . Residential other deliveries
- . Business curb deliveries
- . Business NDCBU deliveries
- . Business centralized deliveries
- . Business other deliveries.

(d) per ES.CNTL, its primary mode of delivery;

(e) its type classification by ES.CNTL (as foot, business motorized, residential P&L, etc.); and

(f) its sample weight.

RESPONSE:

The requested data are reported in the Excel workbook MPA26.xls, which has been included in a new library reference, USPS LR-I-219, to be filed shortly. Note that the four ES routes that were excluded from the calculation of street-time percentages in USPS LR-I-159 are listed in the last four rows of this new Excel file.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

MPA/USPS-T12-27. Please provide the ES unit code and route number for the four sampled routes which were eliminated from your analysis because they could not be located on the City Carrier Route master File.

RESPONSE:

These unit codes and route numbers are reported on the Excel workbook MPA26.xls, which has been included in a new library reference, USPS LR-I-219, to be filed shortly. The codes and route numbers for the four missing routes are reported in the last four rows of this workbook.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-28. Please refer to Library Reference LR-I-159, and therein to the description of the ALDRAN.FOS.STS.SAS.DATA set, where it indicates that there were 24 variables, one of which is route type. Please also refer to Library Reference LR I-I 63, and therein, where it states that there are 20 variables and no route type is indicated. Please state whether:

(a) Was there a route-type variable in the original Engineering Standards (ES) data base?

(b) If so, why it was deleted in LR-I-163?

RESPONSE:

(a) Yes

(b) It was considered less important than the variables that were included in LR-I-163.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA\USPS-T12-29. Please explain, for purposes of designating route type for each sampled ES route and processing the ES tallies, whether the ES database designation was retained throughout the ES.CNTL SAS run or whether the route type was designated by ES.CNTL.SAS, using the route type assigned to the routes in ALDRAN.HQ059TOI .CITY.PQFY97.

RESPONSE:

ES.CNTL does not use the route type reported for each route on the ES database file ALDRAN.FOS.STS.SAS.DATA in order to assign routes to the six STS route-type categories. Instead, ES.CNTL defines an alternative route type variable based on values for delivery mode and numbers of possible deliveries by type. It obtains these delivery mode and possible delivery observations from the data set

ALDRAN.HQ059T01.CITY.PQ4FY97. Lines 104 through 122 of the ES.CNTL program code allocates ES routes across the six route-type categories based on combinations of delivery mode and relative numbers of possible deliveries. These lines can be found on page 9 of USPS LR-I-159.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-30. Please provide the original ES database route-type
variable for each observed route.

RESPONSE:

The following table reports the route type for each ES route as recorded on the ES
database file ALDRAN.FOS.STS.SAS.DATA.

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
1	731	4	FOOT	1
2	731	25	RES LOOP	2
3	731	41	RES CURB	3
4	1106	12	RES LOOP	2
5	1106	18	RES LOOP	2
6	1118	42	RES CURB	3
7	1606	3	RES LOOP	2
8	1606	7	RES LOOP	2
9	1606	23	RES LOOP	2
10	8619	8	RES CURB	3
11	8619	26	RES LOOP	2
12	8619	28	RES LOOP	2
13	8629	12	RES LOOP	2
14	8629	34	FOOT	1
15	8629	47	FOOT	1
16	8648	46	RES LOOP	2
17	8648	80	RES LOOP	2
18	10019	46	FOOT	1
19	19380	8	RES LOOP	2
20	19380	44	RES CURB	3
21	19382	29	RES LOOP	2
22	20003	5	RES LOOP	2
23	20003	20	RES LOOP	2
24	20024	2	RES LOOP	2
25	20024	17	RES LOOP	2
26	20737	4	RES LOOP	2
27	20737	7	RES LOOP	2
28	20737	9	RES LOOP	2
29	20737	16	RES LOOP	2
30	20782	12	RES LOOP	2
31	20782	17	RES LOOP	2
32	20782	18	RES LOOP	2
33	20782	21	RES LOOP	2
34	23455	46	RES LOOP	2
35	23455	66	RES CURB	3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
36	27408	1	RES LOOP	2
37	27408	2	RES LOOP	2
38	27408	3	RES LOOP	2
39	27408	6	RES LOOP	2
40	27408	7	RES CURB	3
41	27408	8	RES LOOP	2
42	27408	9	RES LOOP	2
43	27408	11	MIX LOOP	4
44	27408	15	RES LOOP	2
45	27408	16	RES LOOP	2
46	27408	17	RES LOOP	2
47	27408	19	RES LOOP	2
48	27408	20	RES LOOP	2
49	27408	21	MIX LOOP	4
50	27408	22	RES CURB	3
51	27408	23	RES LOOP	2
52	27408	24	RES LOOP	2
53	27408	25	RES CURB	3
54	27408	27	MIX LOOP	4
55	27408	28	RES LOOP	2
56	27408	30	RES LOOP	2
57	27408	31	RES LOOP	2
58	27408	32	MIX LOOP	4
59	30087	1	MIX CURB	5
60	30087	2	RES CURB	3
61	30087	3	RES CURB	3
62	30087	5	RES CURB	3
63	30087	11	RES CURB	3
64	30087	14	RES CURB	3
65	30087	17	RES CURB	3
66	30087	26	RES CURB	3
67	30087	27	RES CURB	3
68	30087	29	RES CURB	3
69	30087	35	RES CURB	3
70	30087	36	RES CURB	3
71	30087	39	RES LOOP	2
72	30087	44	RES CURB	3
73	30087	47	RES CURB	3
74	30087	48	RES CURB	3
75	30087	56	RES CURB	3
76	30087	59	RES LOOP	2
77	30087	70	RES CURB	3
78	31904	11	RES LOOP	2
79	31904	24	RES CURB	3
80	31904	32	RES LOOP	2
81	31904	74	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
82	32304	5	RES LOOP	2
83	32304	67	RES LOOP	2
84	32304	98	RES LOOP	2
85	32310	49	RES CURB	3
86	34616	20	RES CURB	3
87	34616	32	RES CURB	3
88	34616	38	RES LOOP	2
89	34621	55	RES CURB	3
90	34621	60	RES LOOP	2
91	34621	67	RES CURB	3
92	34621	69	RES LOOP	2
93	34624	51	RES LOOP	2
94	34624	65	RES LOOP	2
95	34624	69	RES CURB	3
96	36201	1	MIX LOOP	4
97	36201	2	BUS MOTOR	6
98	36207	11	RES LOOP	2
99	36207	16	RES CURB	3
100	39206	11	RES LOOP	2
101	39206	21	RES LOOP	2
102	39216	5	BUS MOTOR	6
103	39216	6	RES LOOP	2
104	45215	58	RES LOOP	2
105	45215	60	RES LOOP	2
106	45215	69	RES LOOP	2
107	45215	79	RES LOOP	2
108	45215	81	RES LOOP	2
109	45215	95	RES LOOP	2
110	45241	4	RES LOOP	2
111	45241	6	RES LOOP	2
112	45241	11	RES LOOP	2
113	45241	14	RES LOOP	2
114	45241	26	RES LOOP	2
115	45242	7	RES LOOP	2
116	45242	11	RES LOOP	2
117	45242	13	MIX LOOP	4
118	45242	14	MIX LOOP	4
119	45242	18	BUS MOTOR	6
120	45242	19	RES CURB	3
121	45242	21	RES CURB	3
122	45242	22	RES LOOP	2
123	45242	24	MIX LOOP	4
124	45242	25	RES CURB	3
125	45242	28	RES CURB	3
126	45242	29	RES CURB	3
127	45242	30	MIX LOOP	4

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
128	45242	32	RES CURB	3
129	45242	33	RES LOOP	2
130	45242	34	RES CURB	3
131	45242	35	MIX LOOP	4
132	45242	36	RES CURB	3
133	45242	37	MIX LOOP	4
134	45242	38	MIX CURB	5
135	45242	41	MIX LOOP	4
136	45242	42	RES LOOP	2
137	45242	43	RES CURB	3
138	45242	48	RES LOOP	2
139	45242	49	RES CURB	3
140	45242	54	RES CURB	3
141	45242	57	RES CURB	3
142	45242	58	RES LOOP	2
143	45242	59	RES LOOP	2
144	45242	62	MIX CURB	5
145	45242	65	RES LOOP	2
146	45242	72	RES LOOP	2
147	45242	85	RES LOOP	2
148	45249	6	RES CURB	3
149	45249	8	MIX LOOP	4
150	45249	9	RES LOOP	2
151	45249	10	MIX CURB	5
152	45249	12	RES LOOP	2
153	45249	15	RES CURB	3
154	45249	16	RES CURB	3
155	45249	17	RES CURB	3
156	45249	20	RES CURB	3
157	45249	26	RES CURB	3
158	45249	31	RES LOOP	2
159	45249	40	RES CURB	3
160	45249	44	RES LOOP	2
161	45249	45	RES LOOP	2
162	45249	99	RES LOOP	2
163	47803	10	RES LOOP	2
164	47803	26	MIX LOOP	4
165	47804	80	RES LOOP	2
166	48035	49	RES CURB	3
167	48036	18	RES CURB	3
168	48036	55	RES LOOP	2
169	48036	56	RES CURB	3
170	48043	10	RES LOOP	2
171	48044	42	RES CURB	3
172	48045	6	RES CURB	3
173	48045	15	RES CURB	3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
174	48184	4	RES LOOP	2
175	48184	5	RES LOOP	2
176	48184	8	RES LOOP	2
177	49201	34	RES LOOP	2
178	49202	11	MIX LOOP	4
179	49203	21	RES LOOP	2
180	53208	18	RES LOOP	2
181	53208	28	RES LOOP	2
182	53208	49	FOOT	1
183	53214	28	RES LOOP	2
184	53214	30	RES LOOP	2
185	53214	35	RES LOOP	2
186	53223	74	RES LOOP	2
187	53223	75	RES CURB	3
188	53223	85	RES LOOP	2
189	60606	10	FOOT	1
190	60606	26	FOOT	1
191	60606	28	FOOT	1
192	63301	5	MIX LOOP	4
193	63301	46	RES LOOP	2
194	63301	64	RES LOOP	2
195	63303	37	RES CURB	3
196	67209	8	RES LOOP	2
197	67212	5	RES CURB	3
198	67212	6	RES LOOP	2
199	68114	1	RES LOOP	2
200	68114	57	RES LOOP	2
201	68124	7	RES CURB	3
202	68124	11	RES CURB	3
203	72204	6	MIX LOOP	4
204	72204	15	RES LOOP	2
205	72204	24	RES LOOP	2
206	72204	26	MIX LOOP	4
207	75067	3	RES CURB	3
208	75067	39	RES CURB	3
209	75067	42	RES CURB	3
210	75080	28	MIX LOOP	4
211	75080	35	RES CURB	3
212	75080	45	RES LOOP	2
213	75093	2	RES CURB	3
214	75228	6	RES LOOP	2
215	75228	14	RES LOOP	2
216	75228	22	RES LOOP	2
217	75228	35	RES LOOP	2
218	76119	1	RES CURB	3
219	76119	13	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
220	76119	17	RES LOOP	2
221	76119	29	RES CURB	3
222	78227	17	RES CURB	3
223	78242	71	RES CURB	3
224	78242	73	RES CURB	3
225	78242	75	RES CURB	3
226	89014	11	RES LOOP	2
227	89014	75	RES LOOP	2
228	89015	7	RES LOOP	2
229	89015	8	RES LOOP	2
230	89015	86	RES LOOP	2
231	90247	8	RES LOOP	2
232	90247	12	RES LOOP	2
233	90247	19	RES LOOP	2
234	90247	25	RES LOOP	2
235	90247	26	RES LOOP	2
236	90247	31	RES LOOP	2
237	90247	32	RES LOOP	2
238	90248	11	BUS MOTOR	6
239	90248	14	RES LOOP	2
240	90248	17	RES LOOP	2
241	90249	10	RES LOOP	2
242	90249	21	RES LOOP	2
243	91761	56	RES CURB	3
244	91761	57	RES CURB	3
245	91764	10	RES LOOP	2
246	91764	19	RES LOOP	2
247	94122	1	FOOT	1
248	94122	2	RES LOOP	2
249	94122	3	RES LOOP	2
250	94122	5	RES LOOP	2
251	94122	6	FOOT	1
252	94122	7	FOOT	1
253	94122	10	FOOT	1
254	94122	11	FOOT	1
255	94122	12	RES LOOP	2
256	94122	13	FOOT	1
257	94122	14	RES LOOP	2
258	94122	15	RES LOOP	2
259	94122	16	FOOT	1
260	94122	19	FOOT	1
261	94122	21	FOOT	1
262	94122	24	FOOT	1
263	94122	25	FOOT	1
264	94122	27	FOOT	1
265	94611	1	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
266	94611	11	FOOT	1
267	94611	21	RES CURB	3
268	94611	31	RES CURB	3
269	96001	1	MIX LOOP	4
270	96001	2	RES LOOP	2
271	96001	3	FOOT	1
272	96001	4	MIX LOOP	4
273	96001	5	MIX LOOP	4
274	96001	6	RES LOOP	2
275	96001	7	MIX LOOP	4
276	96001	8	MIX LOOP	4
277	96001	10	RES LOOP	2
278	96001	11	RES CURB	3
279	96001	12	RES LOOP	2
280	96001	13	RES LOOP	2
281	96001	14	RES LOOP	2
282	96001	15	RES CURB	3
283	96001	16	RES LOOP	2
284	96001	17	RES CURB	3
285	96001	19	RES LOOP	2
286	96001	20	RES LOOP	2
287	96001	23	RES LOOP	2
288	96001	24	RES LOOP	2
289	96001	26	RES LOOP	2
290	96001	28	RES LOOP	2
291	96001	29	RES LOOP	2
292	96001	30	RES LOOP	2
293	96001	31	RES LOOP	2
294	96002	40	MIX LOOP	4
295	96002	41	RES LOOP	2
296	96002	42	RES LOOP	2
297	96002	43	MIX LOOP	4
298	96002	44	RES CURB	3
299	96002	45	RES LOOP	2
300	96002	46	RES CURB	3
301	96002	47	RES LOOP	2
302	96002	48	RES LOOP	2
303	96002	49	RES LOOP	2
304	96002	50	MIX LOOP	4
305	96002	51	RES LOOP	2
306	96002	52	RES LOOP	2
307	96002	53	RES LOOP	2
308	96002	54	RES LOOP	2
309	96002	55	RES LOOP	2
310	96002	56	RES LOOP	2
311	96002	57	RES LOOP	2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

COUNT	ZIP 5	ROUTE NUMBER	ROUTE TYPE VALUE AS REPORTED ON THE ES DATA BASE FILE ALDRAN.FOS.STS.SAS.DATA	ROUTE TYPE CODE
312	96002	81	MIX LOOP	4
313	96003	70	RES LOOP	2
314	96003	71	RES LOOP	2
315	96003	72	RES LOOP	2
316	96003	73	RES LOOP	2
317	96003	74	RES LOOP	2
318	96003	75	RES LOOP	2
319	96003	76	RES LOOP	2
320	96003	77	RES LOOP	2
321	96003	78	RES LOOP	2
322	96003	79	RES LOOP	2
323	96003	80	RES LOOP	2
324	96003	82	RES LOOP	2
325	96003	83	RES LOOP	2
326	96003	84	RES LOOP	2
327	98011	32	RES CURB	3
328	98011	33	RES CURB	3
329	98011	42	RES CURB	3
330	98011	45	RES LOOP	2
331	98011	48	RES CURB	3
332	98310	24	RES LOOP	2
333	98310	61	RES LOOP	2
334	98312	33	RES CURB	3
335	98312	37	RES CURB	3
336	98312	52	RES CURB	3
337	98337	3	RES LOOP	2
338	98337	5	RES LOOP	2
339	98337	6	RES LOOP	2
340	98337	7	RES LOOP	2

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA**

**MPA/USPS-TI2-31. Please identify the other variables in
ALDRAN.FOS.STS.SAS.DATA set that were not included in LR-I-163.**

RESPONSE:

The variables on ALDRAN.FOS.STS.SAS.DATA that are not in LR-I-163 are as follows:

- 1. ZIP3**
- 2. ZIP2**
- 3. ZIP5**
- 4. State**
- 5. City**
- 6. Subcode (a code indicating whether the carrier was present)**
- 7. Subpres (a notation indicating whether the carrier was present)**
- 8. Rtype (route type name according to the ES data base)**
- 9. Rtcde (route type code assigned to a given value for Rtype: 1 = mix curb,
2 = mix loop, 3 = residential curb, 4 = foot, 5 = residential loop, 6 = business
motorized)**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO INTERROGATORIES OF
THE MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T12-36. For purposes of ALDRAN.HQ059TOI .CITY.PQ4FY97, please state the definition of "phantom route."

RESPONSE:

Phantom route is a term that describes a special number assigned to a specific multidelivery segment within a city carrier letter route. This route segment is separately identified for purposes of incoming primary or secondary distribution. A typical example is an individual firm holdout or apartment building.

DECLARATION

I, Donald M. Baron, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Donald M. Baron

Date: 3-3-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 3, 2000