

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001**

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POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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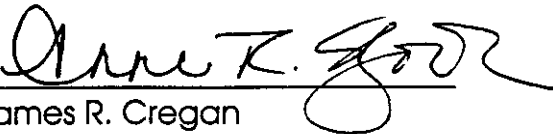
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Docket No. R2000-1

**FIRST SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS TAYMAN  
(MPA/USPS-T9-1-3)**

**(March 14, 2000)**

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS Witness Tayman (MPA/USPS-T9-1-3).

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

**FIRST SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA  
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN**

**MPA/USPS-T9-1.** According to LR-I-126, section 1 (Original LR), clerk workhours for Advanced Flat Sorting Machine (AFSM) for FY 2000 will decrease by 129,000 hours (1,086 machines x 118.8 hours per machine) and maintenance hours for FY 2000 will increase by 51,000 hours (1,086 machines x 50 hours per machine). Clerk workhours for FY 2001 will decrease by 2,715,000 hours (1,086 machines x 2,500 hours per machine) and maintenance hours will increase by 410,000 hours (1,086 machines x 377.5 hours per machine). On February 18, you filed errata (Errata) to the Original LR.

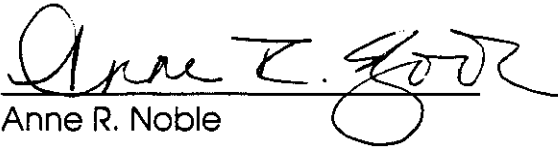
- a. Please confirm that the Errata did not change the FY 2000 cost or workhour savings or the FY 2001 cost or workhour savings estimated from deployment of AFSM 100s.
- b. Please confirm that the Original LR estimates the use of 1086 AFSM 100s in FY 2000 and 1086 AFSM 100s in FY 2001.
- c. Please confirm that the Errata estimates the use of only 173 AFSM 100s in FY 2000 and 173 AFSM 100s in FY 2001.
- d. Please confirm that the Errata estimates workhours savings resulting from use of the AFSM 100s that are greater by a factor of 6.2775 than those estimated by the Original LR.
- e. Please confirm that 1086 divided by 173 is 6.2775.
- f. Please explain how you found the errors in the number of machines and the hours savings per machine and provide all work papers showing original and revised calculations.
- g. Please explain the process the USPS followed in estimating cost reductions for the ASFSM 100.

**MPA/USPS-T9-2.** Please reconcile the difference in FY 2001 workhour savings for "Accelerate FSM Buy Into 2001" of 29,727.3 hours per machine (Original LR) with the FY 2001 workhour savings per machine of 15,693.6 hours cited in the Errata.

**MPA/USPS-T9-3** Please reconcile the difference in FY 2001 workhour savings for "Additional Advanced Flat Sorter Machine (AFSM) To Upper Bound" of 43,181.8 hours per machine (Original LR) with the FY 2001 workhour savings per machine of 15,693.6 hours cited in the in the Errata.

**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.

  
Anne R. Noble

Washington, D.C.  
March 14, 2000