

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

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POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

**SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS BARON
(MPA/USPS-T12-37-40)**

(March 14, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS Witness Baron (MPA/USPS-T12-37-40).

Respectfully submitted,



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**SECOND SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS BARON**

MPA/USPS-T12-37. Please explain why you did not re-estimate the CAT/FAT (Curbline Access/Foot Access Test) split factors to reflect the 1998 possible stops coverage levels. With respect to the CAT split factors, please confirm the following. If you do not confirm, please explain why:

- (a) Residential and Curbline SDR, MDR, and B&M stops coverages, estimated from the City Carrier Cost System (CCS), are used with the estimating models.
- (b) That you assume that all stops on the routes described in (a) are curbline stops.
- (c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the CAT models.

MPA/USPS-T12-38. With respect to the FAT Foot split factors, please confirm the following. If you do not confirm, please explain why:

- (a) Business, Residential, and Mixed SDR, MDR, and B&M stops coverages, as estimated from the City Carrier Cost System (CCS), are used with the estimating models.
- (b) That you assume that all stops on the routes described in (a) are FAT foot stops.

MPA/USPS-T12-39. With respect to the Park & Loop FAT split factors, please confirm the following. If you don confirm, please explain why:

- (a) Business Motorized, Residential Park & Loop, and Mixed Park & Loop SDR, MDR, and B&M stops coverages, estimated from the CCS, are used with the estimating models.
- (b) That you assume that all stops on the routes described in (a) are FAT Park & Loop stops.
- (c) Drive Time, as measured from Mr. Raymond's Engineered Standards database, is not reflected in the Park & Loop FAT models.

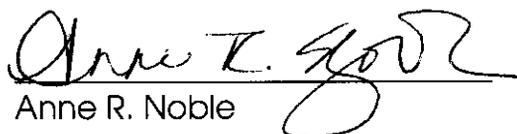
MPA/USPS-T12-40. With respect to the Drive Time category, as measured from Mr. Raymond's Engineered Standards:

- (a) Please confirm that it represents both Drive Time associated with Park & Loop stops as well as the Drive Time associated with Dismount Stops. If this is incorrect, please explain.

- (b) Does it also represent the Drive Time associated with motorized Central, NDCBU, and VIM stops? Please explain.
- (c) Please confirm that the Drive Time described in (a) and (b) above is not reflected in any of the CAT/FAT models.
- (d) Please confirm that the Drive Time described in (a) and (b) above, and as measured from Mr. Raymond's Engineered Standards database, is attributed by the USPS on the basis of the R97-1 analyses of Drive/Stop, Stop/Activity, Deviation Delivery/Piece, and Routine Loops and Dismounts/Volume Variabilities.

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