

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

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OFFICE OF THE SECRETARY**

POSTAL RATE AND FEE CHANGES, 2000

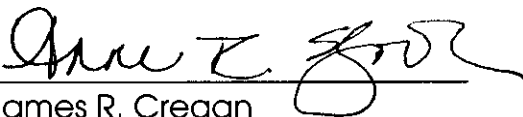
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) Docket No. R2000-1
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**SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS SMITH
(MPA/USPS-T21-2)**

(MARCH 21, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America, Inc. hereby submits the attached interrogatory (MPA/USPS-T21-2) to USPS Witness Smith.

Respectfully submitted,



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Counsel
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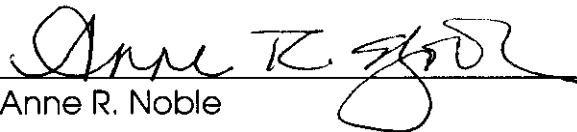
**SECOND SET OF INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS SMITH**

MPA/USPS-T21-2. Please refer to your response to POIR # 4.

- a. Please provide Periodicals Regular Rate billing determinants for FY 1989, FY 1992, and FY 1999. Please provide the billing determinants in an electronic spreadsheet using the rate categories that the Postal Service is proposing in this docket.
- b. Please describe the methodology that you used to develop billing determinants for FY 1989 and FY 1992.
- c. Please confirm that Periodicals Regular Rate mailers performed more worksharing in FY 1999 than they performed in either FY 1989 or FY 1992. If not confirmed, please explain.
- d. In an electronic spreadsheet format, please provide the following information from MODS individually for each year from FY 1989 to FY 1999:
 1. Manual flat sorting total piece handlings (TPH)
 2. Manual flat sorting work hours
 3. Manual flat sorting productivity
 4. FSM TPH
 5. FSM work hours
 6. FSM productivity
- e. In an electronic spreadsheet format, please provide the following information individually for each year from FY 1989 to FY 1999. If you cannot provide this exact information, please disaggregate wage-level-adjusted Periodical Regular Rate unit mail processing costs in as similar a fashion as possible: (1) wage-level-adjusted Periodicals Regular Rate unit cost for allied/support mail processing operations; (2) wage-level-adjusted Periodicals Regular Rate unit cost for piece distribution operations; (3) wage-level-adjusted Periodicals Regular Rate unit cost for bundle distribution operations; (4) wage-level-adjusted Periodicals Regular Rate unit cost for all other mail processing operations.

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 DC
March 21, 2000