

**THIRD SET OF INSTITUTIONAL INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO THE UNITED STATES POSTAL SERVICE**

MPA/USPS-14. Please provide, for each purchased highway account number and in total, the best available estimate of the number and cost of highway contracts that in BY98 provided drayage of trailers (a) to railroad yards, and, (b) from railroad yards. Please provide separate estimates for power-only vs. other contracts. In machine-readable form, please identify all such contracts.

MPA/USPS-15. Please confirm that the duration of a representative USPS highway contract is four (4) years. If not confirmed, please provide the correct length of duration. Please provide copies of any studies or analyses underlying the practice of the Postal Service of engaging in contracts of this duration.

MPA/USPS-16. Please provide, for each purchased highway account number and in total, the best available estimate of the changes in cost that will occur upon the expiration or resolicitation of the contracts in effect in BY98.

MPA/USPS-17. Please describe and provide documentation for each of the following:

- a. analytical tools, including computer models, used to ensure that overall purchased transportation costs are minimized, subject to applicable service requirements and operating constraints;
- b. management information systems used to report and control purchased transportation costs;
- c. studies of unutilized or under-utilized transportation capacity; and
- d. projections of the impact of USPS market and operating changes on transportation requirements during any portion of the period 1994-2002.

MPA/USPS-18. Please describe the circumstances under which a vehicle moving pursuant to a highway contract could make a scheduled stop at a postal facility (other than the starting point of the trip) without unloading mail.

MPA/USPS-19. Please provide a copy of the contract(s) under which the Postal Service procures mail-related transportation from Amtrak.

MPA/USPS-20. Please itemize and describe the criteria used by the Postal Service to establish capacity requirements on individual Amtrak segments. Please state the average frequency with which these capacity requirements are typically adjusted.

MPA/USPS-21. For each Amtrak segment, please provide all capacity adjustments, including the date of the adjustment and before/after values of linear feet and cost, occurring between FY96 and BY98 inclusive.

MPA/USPS-22. For FY96, FY97 and FY98, please provide the best available estimate of the costs to the Postal Service of movements made using "Roadrailleurs" on Amtrak. Please include payments to Amtrak, drayage costs, trailer costs and any other relevant costs. Please provide the amount of such costs accruing in each applicable USPS account.

MPA/USPS-23. Please provide the best available estimates of the proportion of FY98 Amtrak Roadrailer costs (see MPA/USPS-22, above) in the following categories:

- a. Movements diverted from intra-SCF highway transportation.
- b. Movements diverted from inter-SCF highway transportation.
- c. Movements diverted from intra-BMC highway transportation.
- d. Movements diverted from inter-BMC highway transportation.
- e. Movements diverted from freight rail transportation.
- f. Movements diverted from conventional Amtrak service.
- g. Movements diverted from commercial air transportation.
- h. Movements diverted from network air transportation.
- i. Other (please describe).

MPA/USPS-24. If the proportion reported in 23(e) is not zero, please state the fraction of this traffic that resulted from transitory rail service problems, such as those occurring in 1997 and 1998 in the wake of the merger between Union Pacific and Southern Pacific railroads.

MPA/USPS-25. Please provide a physical description, including weight and dimensions, of all types of containers used to carry mail on purchased transportation contract movements, including the 3910A Amtrak container.

MPA/USPS-26. Please describe the service or operational factors that cause periodicals to require Amtrak service as opposed to highway or freight rail.

MPA/USPS-27. Please provide the best available estimate of the proportion of periodicals moving on Amtrak that originates at the following types of facilities:

- a. BMC's;
- b. SCF's;
- c. mailer facilities;
- d. other (please describe).

MPA/USPS-28. Please identify and describe factors other than fluctuations in mail volume that prevent full utilization of cubic capacity in purchased surface transportation.

MPA/USPS-29. Please identify, describe and estimate the likely impact of any current or planned Postal Service initiatives to increase the utilization of cubic capacity in purchased surface transportation.

MPA/USPS-30. Please identify, describe and estimate the likely impact of any current or planned Postal Service initiatives to reduce purchased surface transportation costs that were not provided in the response to (29).

MPA/USPS-31. Please identify, describe and estimate the changes in purchased transportation costs that are projected to result from:

- a. Planned changes in the use of Amtrak; and,
- b. Changes in freight rail service availability and rates in the region formerly served by Conrail.

MPA/USPS-32. Please provide, for each purchased highway account number and in total, the best available estimate of the number and annual cost of highway contracts that provide plant load service.

MPA/USPS-33. For trailers owned or leased by USPS in BY98, please provide the best available estimates of the proportions of time such trailers were utilized in the following types of line haul service:

- a. freight rail;
- b. intra-BMC highway contract;
- c. inter-BMC highway contract;
- d. inter-P&DC/cluster/area highway contract;
- e. intra-P&DC/CSD highway contract;
- f. plant load contract;
- g. postal vehicle service; and
- h. other (itemize and describe).

MPA/USPS-34. Please provide the best available estimate of the proportion of USPS highway transportation requirements that is met through use of 28' trailers. Please provide copies of any studies or other analyses that measure the operational and/or cost impacts that would be associated with more widespread use by the Postal service of 28' trailers.

MPA/USPS-35. Please provide the best available estimate of the proportion of FY98 USPS inter-BMC purchased highway cost that represents trailers diverted from freight rail due to transitory rail service problems, such as those occurring in 1997 and 1998 in the wake of the merger between Union Pacific and Southern Pacific railroads.

MPA/USPS-36. Reference is made to highway transportation contracts wherein service is purchased on a per-trip (as opposed to regularly scheduled) basis:

- a. Please describe the types of circumstances under which per-trip contracts are utilized.
- b. Please provide copies of any contracting guidelines promulgated by USPS regarding use of per-trip highway contracts.
- c. In machine-readable form, please identify each such highway contract, and state the actual payments made under each such contract in BY98.

MPA/USPS-37. Reference is made to highway transportation contracts wherein service is purchased on a one-way (as opposed to round trip) basis:

- a. Please describe the types of circumstances under which one-way contracts are utilized.

- b. Please provide copies of any contracting guidelines promulgated by USPS regarding use of one-way highway contracts.
- c. In machine-readable form, please identify each such highway contract.

MPA/USPS-38. Please confirm that all leasing and ownership costs associated with USPS-supplied trailers accrue in account number 53136. If not confirmed, please provide the best available estimate of the magnitude of such costs, and indicate the account(s) in which they accrue.

MPA/USPS-39. Please refer to USPS-LR-I-52, at page 26. Please confirm that the "NASS File" (LAXSTN.PS272D13(0)) contains the sequence of facilities served at the stops made on each purchased highway transportation contract. If not confirmed, please provide this information in machine-readable form.

MPA/USPS-40. For each freight railroad providing mail-related transportation to the Postal Service in BY98, please provide the following:

- a. total costs accrued in USPS rail transportation accounts in BY98. (If these costs do not sum to \$199.55 million (= Railroad Transportation Subcomponent Subtotal less accounts 53142 and 53144, as shown on page 77 of USPS-LR-I-1), please explain.);
- b. documentation of any and all volume incentive rate, discount or credit terms in effect for transportation provided to the Postal Service in BY98;
- c. the number of mail-related van movements, total costs, base rates and lowest achieved volume incentive rates by O-D pair served in BY98.

MPA/USPS-41. For mail transportation service procured by the Postal Service from freight railroads, please provide the average cost per cubic foot-mile by railroad in FY96 and BY98.

MPA/USPS-42. Please state the proportion of costs accruing in account number 53192 that reflect freight rail movements of empty USPS-owned or -leased trailers. Please state the proportion of costs accruing in account number 53192 that reflects freight rail movements of trailers carrying empty mail containers.

MPA/USPS-43. Please state the definition of account number 53624. Please provide the accrued cost for this account in BY98.

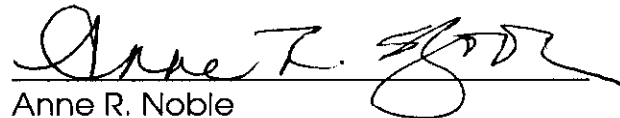
MPA/USPS-44. Please state the number of cubic feet associated with each linear foot of capacity procured on Amtrak.

MPA/USPS-45. Please describe changes in the procedures used to manage surface transportation contracting that have occurred since FY96.

MPA/USPS-46. Please describe the data system(s) relied upon by the Postal Service to measure the utilization of space purchased on each Amtrak segment. Please provide this information in machine-readable form for BY98.

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