

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

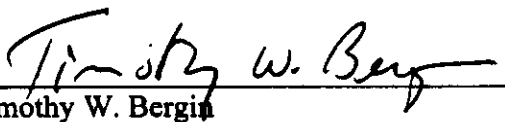
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

INTERROGATORIES OF THE McGRAW-HILL
COMPANIES, INC. TO USPS WITNESS MARC A. SMITH (MH/USPS-T21-1-2)
(March 22, 2000)

Pursuant to the Commission's rules of practice, sections 25-27, The McGraw-Hill Companies, Inc. directs the following interrogatories and other discovery requests to United States Postal Service witness Marc A. Smith (USPS-T-21). To the extent, if any, that witness Smith is unable to respond fully, we request that a response be provided by the person best able to do so.



Timothy W. Bergin
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Counsel for The McGraw-Hill
Companies, Inc.

MH/USPS-T21-1: With reference to the Attachment to your response to Presiding Officer's Information Request No. 4:

a. Please explain why the mail processing unit costs for First-Class non-carrier route/presort flats would nearly double from 1996 to 1997 (as set forth in Table 2).

b. Please explain why the mail processing unit costs for First-Class carrier route/presort flats would increase more than five-fold from 1996 to 1997 (as set forth in Table 3).

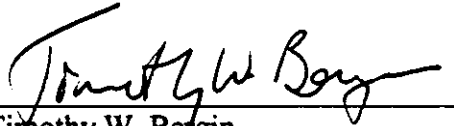
c. Please explain why the unit mail processing costs for Periodicals Regular Rate mail in 1998 would increase by 9.5 percent over 1997 (as set forth in Table 4), while the unit mail processing costs for Standard A Nonprofit flats in 1998 would decrease by 15.2 percent from 1997 (as set forth in Table 7). Please explain the role in this regard of the non-automation processing of machinable, prebarcoded, non-carrier-route Periodicals mail.

d. Please explain why the unit mail processing costs for Periodicals Regular Rate mail in 1999 would increase by 2.3 percent over 1998 (as set forth in Table 4), while the unit mail processing costs for Standard A Regular flats in 1999 would decrease by 2.6 percent from 1998 (as set forth in Table 5). Please explain the role in this regard of the non-automation processing of machinable, prebarcoded, non-carrier-route Periodicals mail.

MH/USPS-T21-2: With reference to Attachment 17 to your testimony, please explain all of the reasons for the disparity in the mail processing unit costs for Periodicals Regular mail and Periodicals Nonprofit mail, respectively.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 22nd day of March 2000 served the foregoing document in accordance with section 12 of the rules of practice.



Timothy W. Bergin