

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

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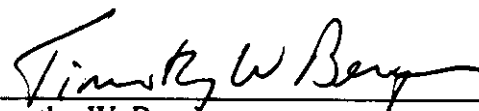
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

)
) Docket No. R2000-1
)

INTERROGATORIES OF THE MCGRAW-HILL
COMPANIES, INC. TO USPS WITNESS TAUFIQUE (MH/USPS-T38-1-3)
(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 Altaf H. Taufique (USPS-T-38). To the extent, if any, that witness Taufique 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-T38-1: Please produce all reports, memoranda, and correspondence created by in-house or outside economists, cost analysts or consultants for the Postal Service since July 1, 1998 concerning possible causes of the relatively rapid cost increases attributed to Periodicals Regular mail by the Postal Service costing systems.

MH/USPS-T38-2: With respect to your testimony (p. 4, ll. 18-19) that "Nonprofit . . . mail is not believed to have different cost causing characteristics compared to Regular mail of the same profile:"

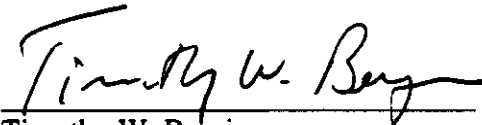
a. Please explain fully all of the reasons for the disparity in mail processing unit costs for Periodicals Regular mail and Periodicals Nonprofit mail, respectively, as set forth in Attachment 17 to the testimony of witness Smith (USPS-T-21).

b. Please confirm that the disparity is not fully explained by billing determinant data. If you do not confirm, please explain fully.

MH/USPS-T38-3: Please explain the extent to which the "significant decline in the value of a barcode," referred to at p. 12, lines 16-17 of your testimony, is caused by the failure of the Postal Service to process machinable, prebarcoded flats in automation operations, as indicated in USPS-LR-1-193, Strategic Improvement Guide for Flats Processing, September 1999, p. 3 ("alarming statistic" that "in FY 1997 more than 50% of all non-Carrier Routed barcoded flats . . . presented by mailers at automation discount rates was processed and distributed in operations other than automation").

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