

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

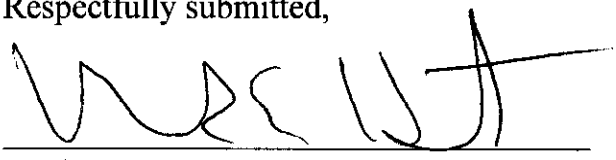
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

: POSTAL RATE AND FEE CHANGES, 2000 : Docket No. R2000-1
: _____:

FIRST SET OF INTERROGATORIES OF PROFESSIONAL
FOOTBALL PUBLICATION ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
TAUFIQUE (PFPA/USPS T38-1-7)

Pursuant to Sections 20, 25 and 26 of the Commission's Rules of Practice, the Professional Football Publication Association, Inc. hereby submits the attached interrogatories to USPS witness Taufique (PFPA/USPS T38-1-7). If the witness is unable to answer the questions, he is requested to refer them to another witness who is capable of providing answers to the questions.

Respectfully submitted,



Mark E. Hunt
Tonda F. Rush
King & Ballow
1100 Union Street Plaza
315 Union Street
Nashville, TN 37201
Counsel for Professional Football
Publication Association, Inc.

March 22, 2000

PROFESSIONAL FOOTBALL PUBLICATION ASSOCIATION, INC.
INTERROGATORIES TO USPS WITNESS TAUFIQUE

PFPA/USPS-T-38-1. What are the service standards for Periodicals mail?

PFPA/USPS-T-38-2. If a tabloid size newspaper sorted at the basic rate, non-automation, is entered in a general mail facility in Buffalo, NY how many days would you expect it to take for the newspaper to be delivered to a home in:

- a. Charlotte, NC.
- b. Atlanta, GA
- c. Miami, FL

PFPA/USPS-T-38-3. If Periodical A had 10 copies to be delivered to 10 different zip codes within Zone 8 (as measured from its office of entry), would you expect all 10 copies to be delivered at the same time as those of Periodical B, if the latter Periodical were entering at the same office and mailing 10 copies to one zip code within Zone 8? Please explain your response.

PFPA/USPS-T-38-4. Would you expect delivery times for a periodical to be shortened for copies that were bar-coded and readable by automated sorting equipment? Please explain your response.

PFPA/USPS-T-38-5. Does the Postal Service maintain any ongoing, objective measurement of Periodicals delivery performance, such as that used to measure on-time delivery of first-class mail? If your answer is yes, please describe that measurement. If your answer is no, please explain why no such measure exists.

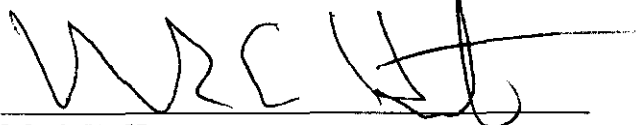
PFPA/USPS-T-38-6. Please provide a list of all committees and task forces formed

within the Postal Service or jointly with periodicals mailers from the base year to date for purposes of improving delivery.

PFPA/USPS-T-38-7. Please provide copies of all public reports, minutes and public briefings issued from base year to date for any committees or task forces named in PFPA/USPS T-38-6.

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read 'MRC Hunt', written over a horizontal line.

Mark E. Hunt
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315 Union Street
Nashville, TN 37201
Counsel for Professional Football
Publication Association, Inc.

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