

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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OFFICE OF THE SECRETARY

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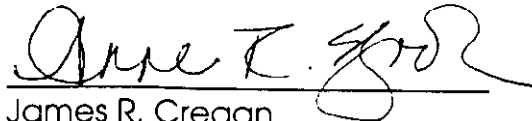
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Docket No. R2000-1

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SECOND SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS TAYMAN  
(MPA/USPS-T9-4-9)  
\_\_\_\_\_

(MARCH 23, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS Witness Tayman (MPA/USPS-T9-4-9).

Respectfully submitted,



James R. Cregan  
Anne R. Noble  
Counsel  
Magazine Publishers of America, Inc.  
Suite 610  
1211 Connecticut Avenue NW  
Washington DC 20036  
(202) 296 7277

**SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS TAYMAN (MPA/USPS-T9-4-9)**

**MPA/USPS-T9-4.** Please state whether the United States Postal Service, in any rate case, has ever proposed different levels of contingency allowance for different classes or subclasses of mail.

**MPA/USPS-T9-5.** Please identify any authority (whether relied upon by you or not) of which the United States Postal Service is aware that supports the concept that the contingency should be the same for all classes and subclasses of mail.

**MPA/USPS-T9-6.** Please identify any authority (whether relied upon by you or not) of which the United States Postal Service is aware that supports the concept that the contingency need not be the same for all classes and subclasses of mail.

**MPA/USPS-T9-7.** Please refer to the article entitled *Postal Service to Cut Work Force*, which appeared in the March 21, 2000 edition of the *Washington Post*, and which is attached hereto as Exhibit A. Please refer in particular to the fourth paragraph of the article, which states:

On an annual basis for the next four years, Henderson said, the Postal Service would save \$100 million on overhead, \$100 million from more efficient paperwork and purchasing procedures, \$100 million in transportation and \$700 million in "break-through productivity" changes aimed at reducing costs in a variety of areas, including automation, staffing, scheduling and business procedures.

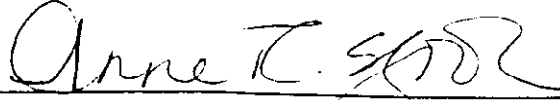
- (a) Please state whether these savings, publicly identified by the Postmaster General, are reflected in cost reduction and other programs.
- (b) If the answer to (a) is affirmative, please state where these savings are reflected, and provide references.
- (c) If the answer to (a) is negative, please explain why.

**MPA/USPS-T9-8.** Please provide any analysis or studies supporting the application of contingency equally across product lines.

**MPA/USPS-T9-9.** Please state whether, when budgeting for new construction, the United States Postal Service uses the same contingency for each project.

**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 23, 2000