

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

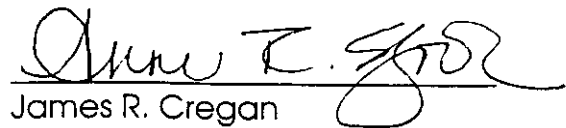
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Docket No. R2000-1

SECOND SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS YACOBUCCI
(MPA/USPS-T25-8)

(MARCH 23, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America, Inc. hereby submits the attached interrogatory (MPA/USPS-T25-8) to USPS Witness Yacobucci.

Respectfully submitted,



James R. Cregan
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**SECOND SET OF INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS YACOBUCCI**

MPA/USPS-T25-8. Please refer to LR-I-90. In particular, refer to Worksheet "Scenario Costs" and the tables entitled "Periodicals Regular Cost Averages - Actual" and "Periodicals Regular Cost Averages - Normalized Auto-Related Cost Savings" on Worksheet "Cost Averaging." Please also refer to your response to PostCom/USPS-T25-3b, where you confirmed that: "The unit costs for 3/5-digit, nonautomation flats are the weighted averages of the unit costs of eligible 3-digit, nonautomation flats and eligible 5-digit, nonautomation flats."

a. Please confirm that the unit cost for 5-digit, nonautomation flats is the weighted average of the unit costs of eligible 5-digit, nonautomation flats on 5-digit pallets and the unit costs of eligible 5-digit, nonautomation flats not on 5-digit pallets.

b. Please confirm that the unit cost for 5-digit, automation flats is the weighted average of the unit costs of eligible 5-digit, automation flats on 5-digit pallets and the unit costs of eligible 5-digit, automation flats not on 5-digit pallets.

c. Please confirm that the unit cost for carrier route flats is the weighted average of the unit costs of eligible carrier route flats on 5-digit pallets and the unit costs of eligible carrier route flats not on 5-digit pallets.

d. Please explain in detail how to modify LR-I-90 to deaverage the unit costs for Periodicals Regular flats on 5-digit pallets from unit costs for Periodicals Regular flats on 5-digit pallets to provide actual cost averages and normalized cost averages for ten types of Periodicals Regular flats: (1) basic nonautomation; (2) basic automation; (3) 3-digit nonautomation; (4) 3-digit automation; (5) 5-digit nonautomation (not on 5-digit pallet); (6) 5-digit nonautomation (on 5-digit pallet); (7) 5-digit automation (not on 5-digit pallet); (8) 5-digit automation (on 5-digit pallet); (9) carrier route (not on 5-digit pallet); and (10) carrier route (on 5-digit pallet).

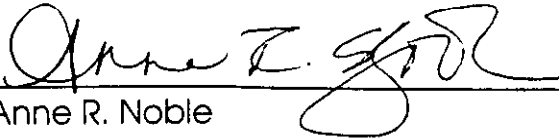
e. Please confirm that LR-I-90 does not explicitly model container sorting costs (i.e., container sorting costs are simply taken into account using CRA adjustment factors). If not confirmed, please explain your response.

f. Please confirm that the following differentials would be different if container sorting costs were explicitly modeled:

- (i) Unit cost of 5-digit nonautomation flats not on 5-digit pallets minus unit cost of 5-digit nonautomation flats on 5-digit pallets
- (ii) Unit cost of 5-digit automation flats not on 5-digit pallets minus unit cost of 5-digit automation flats on 5-digit pallets
- (iii) Unit cost of carrier route flats not on 5-digit pallets minus unit cost of carrier route flats on 5-digit pallets

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