

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

RECEIVED

APR 6 4 45 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS SMITH TO INTERROGATORY OF  
MAGAZINE PUBLISHERS OF AMERICA  
(MPA/USPS-T21-2(d-e)) - ERRATA

The United States Postal Service hereby provides the revised response of witness Smith to the following interrogatory of Magazine Publishers of America: MPA/USPS-T21-2(d-e), filed on March 21, 2000. The revised response only effects subpart d, but replaces entirely the response originally filed on April 4, 2000. Interrogatories MPA/USPS-T21-2(a-c) were redirected to witness Taufique.

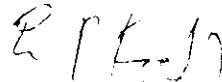
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992 Fax -5402  
April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA**

**MPA/USPS-T21-2.** Please refer to your response to POIR #4.

a. Please provide Periodicals Regular Rate billing determinants for FY 1989, FY 1992, and FY 1999. Please provide the billing determinants in an electronic spreadsheet using the rate categories that the Postal Service is proposing in this docket.

b. Please describe the methodology that you used to develop billing determinants for FY 1989 and FY 1992.

c. Please confirm that Periodicals Regular Rate mailers performed more worksharing in FY 1999 than they performed in either FY 1989 or FY 1992. If not confirmed, please explain.

d. In an electronic spreadsheet format, please provide the following information from MODS individually for each year from FY 1989 to FY 1999:

1. Manual flat sorting total piece handlings (TPH)
2. Manual flat sorting work hours
3. Manual flat sorting productivity
4. FSM TPH
5. FSM work hours
6. FSM productivity

e. In an electronic spreadsheet format, please provide the following information individually for each year from FY 1989 to FY 1999. If you cannot provide this exact information, please disaggregate wage- level-adjusted Periodical Regular Rate unit mail processing costs in as similar a fashion as possible:

- (1) wage-level-adjusted Periodicals Regular Rate unit cost for allied/support mail processing operations;
- (2) wage-level-adjusted Periodicals Regular Rate unit cost for piece distribution operations;
- (3) wage-level-adjusted Periodicals Regular Rate unit cost for bundle distribution operations;
- (4) wage-level- adjusted Periodicals Regular Rate unit cost for all other mail processing operations.

**Response:**

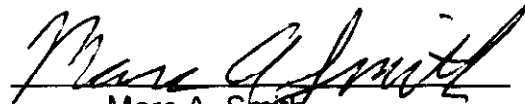
a-c. Redirected to witness Taufique, USPS-T-38.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA**

- d. The requested data are provided in USPS-LR-I-283. The data available for the years prior to FY93, employ a different data editing procedure than for the data available for FY93 and after. In order to assist users of this data we have provided the results using three different editing procedures, including the results of alternative editing procedures for a portion of the years. MODS FSM and manual flats sorting productivities, workhours, and TPH for FY 89 to FY 96 are provided based on the "scrubbed" data from Dr. Bradley's testimony, USPS-T-14, from Docket No. R97-1. The "unscrubbed" data was not readily available. These same data for the years FY93 to FY98 are provided based on the "unscrubbed" data set from Dr. Bozzo's testimony, USPS-T-15. In addition, a third set of productivities, workhours, and TPH data for FY96 to FY99 is provided, which was developed by eliminating the observations containing the highest one percent and lowest one percent of the productivities. It is this method which has been used to provide the productivities for mail processing cost models in both Docket No. R97-1 and this case.
- e. Costs can not be provided, in a meaningful way, by operations or groupings of operations using the costing methodology for processing costs contained in POIR No. 4. Doing so requires use of MODS based costing, which is not available for the requested time period as discussed in my response to POIR No. 4.

DECLARATION

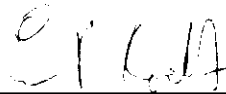
I, Marc A. Smith, hereby declare, under penalty of perjury, that the foregoing Docket No. R2000-1 interrogatory responses are true to the best of my knowledge, information, and belief.

  
Marc A. Smith

4/6/2000  
Date

## CERTIFICATE OF SERVICE

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



---

Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992 Fax -5402  
April 6, 2000