

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DEGEN TO INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
(MPA/USPS-T16-16)

The United States Postal Service hereby provides the response of witness Degen to the following interrogatories of MPA: MPA/USPS-T16-16, filed on March 31, 2000.


Each 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



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April 14, 2000

Response of United States Postal Service Witness Degen
To Interrogatories Of Magazine Publishers Of America Inc.

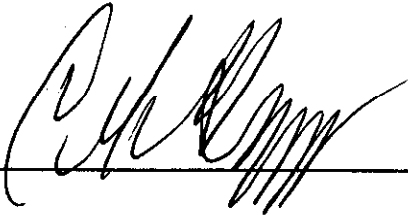
MPA/USPS-T16-16. Please refer to interrogatory MPA/USPS-T16-10, which requested "a corresponding spreadsheet that aggregates the subclass profiles for each piece and item type." The intent of this interrogatory was to obtain a table providing subclass profiles for each piece and item type, aggregating over "all tallies for single pieces and single items..., all tallies for items and loose pieces in identical containers..., and all tallies for items and loose pieces in non-identical containers...from the 1995 Platform Study." The intent of this interrogatory was *not* to obtain a table that aggregated *over* the piece and item types. Please provide a table that aggregates over container type (non-container, identical container, non-identical container) but that still provides full detail on both subclass profile and piece and item type.

MPA/USPS-T16-16 Response.

I am providing the requested subclass profile by item and piece type, aggregating over all weighted handling tallies (i.e., single piece tallies, single item tallies, and identical and non-identical container tallies), as workbook file mpa-16.xls in USPS-LR-I-301.

DECLARATION

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.



Date: 4-14-00

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.



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