

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001**

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

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**REVISIONS TO FOURTH SET OF INTERROGATORIES (FOLLOW-UP) OF  
MAGAZINE PUBLISHERS OF AMERICA, INC. TO USPS WITNESS  
RAYMOND PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/35  
(MPA/USPS-T13-112-116, 118, 120, 123, 125) - SECOND ERRATA**

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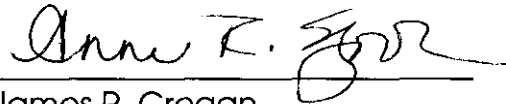
**(April 24, 2000)**

Pursuant to Presiding Officer's Ruling No. R2000-1/35, and following review of witness Raymond's responses to Presiding Officer's Information Request No. 8, Magazine Publishers of America (MPA) hereby amends its fourth set of interrogatories to witness Raymond, originally filed on March 30, 2000, in the following respects:

1. MPA withdraws interrogatories MPA/USPS-T13-112, 113, 114, 115, 116, 118, 120, and 125. These interrogatories followed up on MPA/USPS-T13-83, 85, 86, 87, 88, 90, 94 and 101.
2. MPA amends its interrogatory MPA/USPS-T13-123, which followed up on MPA/USPS-T13-99, to withdraw a number of subparts to the question. This interrogatory, as amended, is attached.

MPA will also shortly be filing a list of specific tallies associated with the remaining interrogatories in its fourth set, which we will hand deliver to the Postal Service. Because of its length, these tallies will be filed as a library reference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anne R. Noble", written over a horizontal line.

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Anne R. Noble  
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**MPA/USPS-T13-123.** MPA/USPS-T13-99 presented a table (reproduced below) showing various types of tallies that you allocated to the Load category. It asked you to "Please explain what the data collector was observing with each of the following tallies, how you can tell, and why you placed each in the 'Load' category." You responded "I cannot respond without references to the specific records in question, including CY code, route ID, date, etc. See Appendix A to USPS-LR-I-163 for relevant data fields."

The purpose of that interrogatory was to gain an understanding of what these types of tallies represent (i.e., what the data collectors were observing), how that can be determined from the tally, and why you assigned these tallies to the Load category. For example, subpart r. below identifies "On Route" carrier location, "Park & Loop" delivery type, "Finger @ Delivery" activity, and "Walk Flat" detail. However, it is unclear from that information where the carrier was and what the carrier was actually doing at the time of the observation, and why you have assigned it to Load.

Please respond to the original question for each of the types of tallies in the table below. For each tally type, provide in narrative form (not just data codes) your best understanding of what the data collector was actually observing. If that cannot be determined or you are unsure, please so state. If additional tally information not contained in the table is needed for an understanding, please identify that information and explain how it helps to understand what the observation represents.


Explain for each subpart why you have assigned the tally type to Load. If the final assignment was based on an algorithm or decisional rule (e.g., all tallies with "x activity" are Load), please provide and explain it.

	Location	Delivery Type	Activity(ies)	Detail(s)
d.	On Route	Central	N/A	Central Inside
e.	On Route or Park Point	Any Delivery Type (WT Codes)	Del/Coll or Finger @ Delivery	Any Receptacle Type (H Codes)
i.	On Route	Curb	Del/Coll	Walking
l.	On Route	Dismount	Finger @ Delivery	Walk Flat
m.	On Route	Dismount	Parcel or Accountable	Walk Flat
n.	On Route	Dismount	Walking	Walk Flat
o.	On Route	Park & Loop	Accountable	N/A
p.	On Route	Park & Loop	Del/Coll	Walk Flat
q.	On Route	Park & Loop	Del/Coll	N/A
r.	On Route	Park & Loop	Finger @ Delivery	Walk Flat
y.	Point of Delivery	Any Delivery Type (WT Codes)	N/A	N/A
z.	Point of	Central, Dismount, or	Setup	Vehicle Code (K

	Delivery	Park & Loop		Codes)
aa.	Point of Delivery	Central	Travel B/t Dlv.	Central Outside
bb.	Point of Delivery	Central	Walking	Central Inside or Outside
cc.	Point of Delivery	Central	Walking	Walk Flat
gg.	Point of Delivery	Any Delivery Type (WT Codes)	Travel B/t Dlv.	Walk or Vehicle Codes (K Codes)
hh.	Point of Delivery	Curb	Travel B/t Dlv.	Walk Flat
ii.	Point of Delivery	Dismount	Parcel or Accountable	Walk Codes (K Codes)
kk.	Point of Delivery	Dismount	Travel B/t Dlv.	Any Receptacle Type (H Codes)
ll.	Point of Delivery	Any Delivery Type (WT Codes)	Del/Coll.	Walk Code (K Codes)
mm.	Point of Delivery	Park & Loop	Travel B/t Dlv.	1 Hand Slam
oo.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Receptacle Codes (H Codes)
pp.	Vehicle	Central, Dismount, Park & Loop	Del/Coll or Finger @ Delivery	Vehicle Codes (K Codes)
tt.	Vehicle	Dismount	Travel B/t Dlv.	Drop to Customer

**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, D.C.  
April 24, 2000