

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

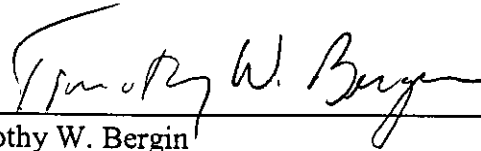
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

**FOLLOW-UP INTERROGATORIES OF
THE McGRAW-HILL COMPANIES, INC. TO
USPS WITNESS KINGSLEY (MH/USPS-T10-22)
(April 28, 2000)**

Pursuant to the Commission's rules of practice, sections 26-28, The McGraw-Hill Companies, Inc. directs the following interrogatories and other discovery requests to United States Postal Service witness Linda A. Kingsley (USPS-T-10). To the extent, if any, that witness Kingsley is unable to respond fully, please redirect these interrogatories to the person(s) best able to do so.



Timothy W. Bergin
Squire, Sanders & Dempsey L.L.P.
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(202) 626-6608

Counsel for The McGraw-Hill Companies, Inc.

MH/USPS-T10-22: With reference to your written response on April 20, 2000 to Hearing Question 2 of MH at Tr. 5/2059, lines 11-13:

(a) Please confirm that the Postal Service has no utilization indicators (similar to the attachment to ANM/USPS-T10-16) for FY 1997 or FY 1998 that would be responsive to the request made at the hearing. If you do not confirm, please produce all such utilization indicators for that period;

(b) Please explain why your response indicates an average FSM 1000 utilization rate of 1,688 TPH for AP5/FY 00, while your response to ANM/USPS-T10-16 indicates an average FSM 1000 utilization rate of 1,576.5 TPH for AP 5/FY 00;

(c) Please explain why your response indicates an average FSM 881 utilization rate of 1,693 TPH for AP 5/FY 00, while your response to ANM/USPS-T10-16 indicates an average FSM 881 utilization rate of 1,624.5 in AP 5/FY 00;

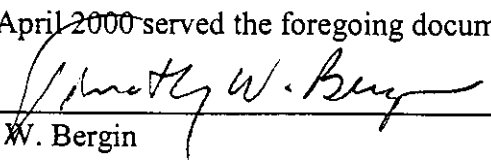
(d) Please explain fully all of the reasons for the steep decline in FSM utilization in AP 4, both in FY 99 and FY 00, both for the FSM 881 and the FSM 1000;

(e) Please explain fully all of the reasons why the average FSM 881 utilization rate declined from 1,756 TPH in AP 8/FY 99 to 1,468 TPH in AP 11/FY 99.

(f) Please explain fully all of the reasons why FSM 881 utilization has been lower in FY 00 than in FY 99.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of April 2000 served the foregoing document in accordance with section 12 of the rules of practice.



Timothy W. Bergin