

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

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
MAGAZINE PUBLISHERS ASSOCIATION WITNESS NELSON  
(USPS/MPA-T3-16 -17)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Nelson: USPS/MPA-T3-16 - 17.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Eric P. Koetting

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June 8, 2000

UNITED STATES POSTAL SERVICE INTERROGATORIES TO MAGAZINE  
PUBLISHERS OF AMERICA, INC. WITNESS MICHAEL NELSON

**USPS/MPA-T3-16.** Please refer to your testimony on page 3, line 8.

- a) Please define what you refer to as "a significant share of long-haul truck traffic" that has been diverted to rail.
- b) What share are you referring to? What products have shifted? Provide all calculations and data underlying the share before and after diversion?
- c) Is it your understanding that the shift was based on price? Please explain.
- d) Is it your understanding that freight railroads typically provide service comparable to highway carriers engaged in just in time service? Please explain.
- e) Is it your understanding that freight railroads typically provide service comparable to highway carriers engaged in trucking mail? Please explain.

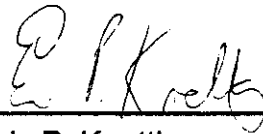
**USPS/MPA-T3-17.** Please refer to your statement on page 3, lines 14 through 22:

"In effect, these mailers are finding that they can provide themselves with more economical transportation than the Postal Service provides for them."

- a) Please provide all studies you have conducted that have lead you to this conclusion.
- b) Please provide the cost per mile of highway transportation used by mailers during the period of "rapid growth" to which you refer.
- c) Please list all mailers with whom you have communicated who told you that they can provide "more economical transportation".
- d) Is it you understanding that mailers bypass postal transportation solely on the basis of relative transportation cost? If your answer is no, please provide all other reasons why Periodicals mailers may choose to provide their own transportation.

**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.

A handwritten signature in black ink, appearing to read "Eric P. Koetting", is written over a solid horizontal line.

Eric P. Koetting

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