

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

RECEIVED
JUN 12 4 20 PM '00
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 OF AMERICA WITNESS COHEN
(USPS/MPA-T1-1-8)

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 Magazine Publishers of America witness Cohen: USPS/MPA-T1-1-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
June 12, 2000

USPS/MPA-T1-1 Please refer to Exhibit 5-1, footnote [2] that accompanies your testimony. Please provide the source in DMA, et al.-T-1 where these amounts appear. If these amounts do not appear in DMA, et al.-T-1, please provide the proper source or provide all calculations you relied upon to produce the results.

USPS/MPA-T1-2 Please refer to Exhibit 4-1 that accompanies your testimony.

- a) Please confirm that the TYAR Cost amounts shown in Column [2] do not include any Final Adjustments. If you do not confirm, please explain fully.
- b) Please confirm that the TYAR Cost amounts shown in Column [2] do not include any Contingency amount. If you do not confirm, please explain fully.
- c) Please confirm that Exhibit 4-1 does not reflect "Other" or "Institutional" costs. If you do not confirm, please fully how "Other" costs are included in your analysis and provide all calculations showing their inclusion.

USPS/MPA-T1-3 Please refer to Exhibit 4-2 that accompanies your testimony.

- a) Please confirm that the TYAR Cost amounts shown in Column [2] do not include any Final Adjustments. If you do not confirm, please explain fully.
- b) Please confirm that the TYAR Cost amounts shown in Column [2] do not include any Contingency amount. If you do not confirm, please explain fully.
- c) Please confirm that the Base Year Cost amounts shown in Column [1] would be different if the Commission's cost methodology had been used. If you do not confirm, please explain fully.

- d) Please confirm that the TYAR Cost amounts shown in Column [2] would be different if the Commission's cost methodology had been used. If you do not confirm, please explain fully.
- e) Please confirm that the Rollforward Ratio amounts shown in Column [3] would be different if the Commission's cost methodology had been used to determine the amounts in either Column [1] or Column [2]. If you do not confirm, please explain fully.
- f) Please confirm that Exhibit 4-1 does not reflect "Other" or "Institutional" costs. If you do not confirm, please fully explain how "Other" costs are included in your analysis and provide all calculations showing their inclusion..

USPS/MPA-T1-4 Please refer to Exhibit 4-3 that accompanies your testimony.

- a) Please confirm that the TYAR Cost amounts in Column [2] do not include any Final Adjustments. If you do not confirm, please explain fully.
- b) Please confirm that the TYAR Cost amounts in Column [2] do not include any Contingency amount. If you do not confirm, please explain fully.
- c) Please confirm that Exhibit 4-1 does not reflect "Other" or "Institutional" costs. If you do not confirm, please fully explain how "Other" costs are included in your analysis and provide all calculations showing their inclusion.

USPS/MPA-T1-5 Please refer to Exhibit 4-4 that accompanies your testimony.

- a) Please confirm that the TYAR Cost amounts in Column [2] do not include any Final Adjustments. If you do not confirm, please explain fully.

- b) Please confirm that the TYAR Cost amounts in Column [2] do not include any Contingency amount. If you do not confirm, please explain fully.
- c) Please confirm that the Base Year Cost amounts shown in Column [1] would be different if the Commission's cost methodology had been used. If you do not confirm, please explain fully.
- d) Please confirm that the TYAR Cost amounts shown in Column [2] would be different if the Commission's cost methodology had been used. If you do not confirm, please explain fully.
- e) Please confirm that the Rollforward Ratio amounts shown in Column [3] would be different if the Commission's cost methodology had been used to determine the amounts in either Column [1] or Column [2]. If you do not confirm, please explain fully.
- f) Please confirm that Exhibit 4-1 does not reflect "Other" or "Institutional" costs. If you do not confirm, please fully explain how "Other" costs are included in your analysis and provide all calculations showing their inclusion.

USPS/MPA-T1-6 Please refer to Exhibit 3-2 that accompanies your testimony.

- a) Please confirm that the USPS methodology Rollforward Ratio in Column [2] is applied to Commission methodology Base Year differences in Column [1]. If you do not confirm, please explain fully.
- b) Please confirm that the USPS methodology Piggyback Factor in Column [4] is applied to rolled-forward Commission methodology Base Year differences in Column [3]. If you do not confirm, please explain fully.

USPS/MPA-T1-7 Please refer to Exhibit 3-1 that accompanies your testimony.

- a) Please confirm that the Rollforward Ratio in Column [2] is the result of running the Postal Service's rollforward model. If you do not confirm, please explain fully.
- b) If the Base Year amounts in Column [1] change, would the Rollforward Ratio in Column [2] change? If amounts in Column [2] would change, please explain conceptually how they would change. If the amounts in Column [2] would not change, please explain why not.
- c) Please confirm that the Piggyback Factors in Column [4] are the result of running the Postal Service's rollforward model. If you do not confirm, please explain fully.
- d) If the Base Year amounts in Column [1] change, would the Piggyback Factors in Column [4] change? If amounts in Column [4] would change, please explain conceptually how they would change. If the amounts in Column [4] would not change, please explain why not.

USPS/MPA-T1-8 Please refer to Exhibit 1 that accompanies your testimony.

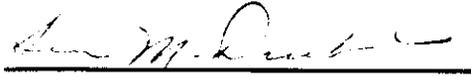
- a) Please confirm that the USPS amounts shown in Column [1] include Final Adjustments. If you do not confirm, please explain fully.
- b) Please confirm that the Final Adjustment amounts provided in USPS-LR-I-131, Volume J, Fiscal Year 2001 After Rates After Workyear Mix Adjustment, Table E, "D" Report (With Final Adjustments), pages 1-2, which uses the

Commission's methodology, are different than the amounts shown in Column [1]. If you do not confirm, please explain fully

- c) Please confirm that the Difference amounts shown in Column [2] do not include Final Adjustments. If you do not confirm, please explain fully how the Final Adjustments are included and provide all calculations showing their inclusion.

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
June 12, 2000