

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

RECEIVED

JUN 13 4 26 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 GLICK
(USPS/MPA-T2-1-7)

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 Glick: USPS/MPA-T2-1-7.

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 13, 2000

USPS/MPA-T2-1. Please refer to MPA-T-2 at p. 23 lines 19-21. Please provide the data and analyses, if any, that support your belief that efforts will “reduce the proportion of bundles that break by about fifty percent” by the Test Year.

USPS/MPA-T2-2. Please confirm that your estimated cost reductions of \$21 million for Periodicals and \$58 million for Standard (A) flats assume that bundle breakage will be reduced by fifty percent by the *beginning* of the Test Year. If you do not confirm, please explain why not.

USPS/MPA-T2-3. Please refer to MPA-T-2 at p. 15 lines 27-29. Here you state that “efforts should reduce $\frac{1}{4}$ Test Year costs for processing Standard (A) Regular flats by \$58 million”. Please refer to your testimony at p. 24, Table 3 (“Test Year Cost Savings by Subclass”). Your table shows savings of \$47.0 million for Standard (A) Regular. Please explain the discrepancy between these two cost savings figures for Standard (A) Regular.

USPS/MPA-T2-4. Please refer to MPA-T-2 at pp. 19-22, which describes four efforts to potentially reduce bundle breakage. Please explain, in quantitative or qualitative terms, what weight you believe each effort will contribute towards achieving your assumed overall fifty percent reduction in bundle breakage.

USPS/MPA-T2-5. Please refer to MPA-T-2 at p. 19, line 7. The first effort towards reducing bundle breakage that you discuss is to “improve bundle

preparation methods” of mailers. Please describe what specific steps, including changes in mailer operations, are required for mailers to improve bundle preparation methods. Please discuss the likelihood that mailers will significantly improve bundle preparation methods by the Test Year.

USPS/MPA-T2-6. Please confirm that within MPA-LR-I-2, you assume that in the Base Year 25 percent of pieces from broken bundles processed on the SPBS are keyed manually. Please provide the data and analyses that support this assumption. If you do not confirm, please explain why not.

USPS/MPA-T2-7. Please refer to MPA-T-2 at p. 19, line 7. The second effort towards reducing bundle breakage that you discuss is to “Move bundles from sacks to pallets”. Please provide the assumptions you used for what portion of volume is in sack and pallets (including the bundle levels) for both the base and test years.

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 13, 2000