

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-T3-53 - 57)

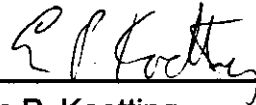
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Nelson: USPS/MPA-T3-53 - 57. Because of issues regarding the production of documentation for Mr. Nelson's testimony, counsel for MPA has informally agreed not to object to these questions as untimely.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

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June 23, 2000

USPS/MPA-T3-53. Please refer to page 14, footnote 7 of your testimony. Please confirm that your analysis excludes Amtrak routes with fewer than 30 feet of contracted footage. Please explain why you excluded Amtrak routes with less than 30 feet of contracted footage.

USPS/MPA-T3-54. Please refer to page 3 of WP-5. Please confirm that you use non-renewal Inter-SCF transportation costs. If confirmed, please explain the meaning of the variable Hkey. Specifically, please explain the meaning of the trailing "Y" in the expression: "Inter-SCF:" + {"0-250", "251-500", "500"} + ":Y".

USPS/MPA-T3-55. Please confirm that the Inter-SCF tractor-trailer (Cube>=1650) Cost/CFMs that you use in your calculations by mileage breakdown (0-250,251-500,500+) are the following:

0-250+	.000401
251-500	.000313
500+	.000296

USPS/MPA-T3-56. Please confirm that you match the 0-250,251-500,500+ highway mileages with the same Amtrak lengths. If not confirmed, please detail which Cost/CFMs you use.

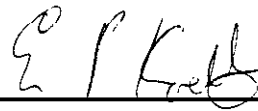
USPS/MPA-T3-57. Please refer to page 15 of your testimony where you state:

"The analysis may also overstate the cost of substitute highway transportation, since it assumes that trucks will follow the Amtrak route, and will not take advantage of shorter paths that likely exist between origins and destinations."

Please refer to page 3 of WP-5 where you calculate highway distances between Amtrak O-D pairs. Please confirm that the highway routings in TransCAD mirror the Amtrak routings. If not confirmed, please explain.

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.



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