

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF PROFESSIONAL FOOTBALL PUBLICATION ASSOCIATION
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
USPS/PFPA T1- 1-6
(June 29,2000)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the Professional Football Publication Association hereby provides responses to the interrogatories of the United States Postal Service, dated June 19, 2000. Each Interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



TONDA F. RUSH
Counsel to
Professional Football Publication Association

King and Ballow
P.O. Box 50301
Arlington, VA 22205
703/241-1480; Fax 703/534-5751

USPS/PFPA T1-1. Please refer to your testimony on page 8 where you state, "Because reader complaints have been a virtual plague these past few years, PFPA has turned increasing attention to finding solutions."

a. Please confirm that Postal Service officials at various levels have worked with your organization in order to improve the service for your publications. If you do not confirm, please explain why.

b. Please confirm that you (or someone on your staff) have provided the Postal Service a list in electronic format of all reader complaints for all the publications listed on page 2 of your testimony in calendar year 1999. If you do not confirm please provide a list of all complaints for these publications for calendar year 1999.

c. Based on the complaint information provided to the Postal Service, please confirm that the total numbers of reader complaints for calendar year 1999 are 197, 295, 241, 371 and 96 respectively for Skins Report, Shout, Giants Insider, Silver and Black Illustrated and Jets Confidential (including complaints from foreign destinations.) If you do not confirm, please explain why and provide your counts of calendar year 1999 complaints by publication.

d. Based on the complaint information provided to the Postal Service, please confirm that the total number of complaints for calendar year 1999 add up to 1200, including 12 complaints for issues that were mailed to foreign subscribers. If you do not confirm, please provide your estimate of the total number of complaints for calendar year 1999.

e. Please confirm that the publications listed at page 2 of your testimony are not sold at the newsstand and that all copies are mailed through the Postal Service. If you do not confirm, please explain why.

f. Please confirm that you mail 31 issues of each of these publications. This was derived based on the assumption that you mail weekly issues during football season (August through January) and monthly issues during off-season. If you do not confirm, then please provide the number of issues mailed for each publication listed on page 2 of your testimony.

RESPONSE:

a. Confirmed. Postal Service officials have spoken to PFPA and have worked with various individual publications to improve service. Some of our publications have participated in "publication watch" services offered by the Postal Service. However, the fixes don't seem to take. Service on one route or for one subscriber may improve temporarily while attention is focused upon that problem, but these seem to be band-aids on a gaping wound. What appears to be needed is a more systemic solution.

b. Not confirmed. The complaints I supplied with my testimony were a sample of those received by our newspapers in 1999. In addition, some complaints have been shared with individual post offices, but not a full list from the year. We no longer have a complete file of all complaints. Some were registered by phone, some by mail and some by electronic mail. It would be impossible for me to estimate how many were received by each of our titles, but the numbers had an enormous impact upon our readership and our newspapers' viability as a time-sensitive product.

c. Not confirmed. Please see my response to USPS/PFPA T1-1(b). I want to note, however, that even if we were to be able to provide an enumerated list, it would not provide the Postal Service with an accurate measurement of service complaints. My experience is that readers complain only after repeated disappointments with service, so each complaint may reflect months of late deliveries.

d. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

e. Not confirmed. All of our publications have some newsstand sales.

f. Not confirmed. Our publications have 24 issues a year.

USPS/PFPA T1-2

a. Based on the circulation of 6,000 for the Skins Report provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of Skins Report mailed is 186,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.

b. Based on 197 reader complaints for Skins Report in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are 0.11 percent of total pieces mailed of 186,000. If you do not confirm, please explain why, and provide your estimate of complaints as a percentage of pieces mailed.

c. Also, please confirm that if the number of issues for Skins Report is 25 instead of 31, the mailed pieces reduce to 150,000 and reader complaints as a percent of total pieces mailed increase to 0.13 percent. If you do not confirm, please explain why.

RESPONSES:

a. Not confirmed. Skins Report is published 24 times per year. The approximate total number of copies of Skins Report mailed in 1999 was 6,000 times 24 or 144,000.

b. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

c. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

USPS/PFPA T1-3

a. Based on the circulation of 13,000 for the Shout provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of Skins Report mailed is 403,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.

b. Based on 295 reader complaints for Shout in calendar year 1999 (including 4 complaints from foreign destinations), please confirm that reader complaints are 0.07 percent of total pieces mailed of 403,000. If you do not confirm, please explain why, and provide your estimate of the complaints as a percentage of pieces mailed.

c. Also, please confirm that if the number of issues for Shout is 25 instead of 31, the mailed pieces reduce to 325,000 and reader complaints as a percent of total pieces mailed increase to 0.09 percent. If you do not confirm, please explain why.

RESPONSE:

a. Not confirmed. Shout is published 24 times per year. The approximate total number of copies of Shout mailed in 1999 was 10,000 times 24 or 240,000.

b. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

c. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

USPS/PFPA T1-4

a. Based on the circulation of 11,000 for the Giants Insider provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of Giants Insider mailed is 341,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.

b. Based on 241 reader complaints for Giants Insider in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are .07 percent of total pieces mailed of 341,000. If you do not confirm, please explain why, and provide your estimate of the complaints as a percentage of pieces mailed.

c. Also, please confirm that if the number of issues for Giants Insider is 25 instead of 31, the mailed pieces reduce to 275,000 and reader complaints as a percent of total pieces mailed increase to 0.09 percent. If you do not confirm, please explain why.

RESPONSE:

a. Not confirmed. Giant is published 24 times per year. The approximate total number of copies of Giant mailed in 1999 was 8,000 times 24 or 192,000.

b. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

c. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

USPS/PFPA T1-5

a. Based on the circulation of 9,000 for the Silver & Black Illustrated provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of copies mailed for Silver and Black Illustrated is 279,000 in a calendar year. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.

b. Based on 371 reader complaints for Silver & Black Illustrated in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are 0.13 percent of total pieces mailed or 279,000. If you do not confirm, please explain why, and provide your estimate of the complaints as a percentage of pieces mailed.

c. Also, please confirm that if the number of issues for Silver and Black Illustrated is 25 instead of 31, the mailed pieces reduce to 225,000 and reader complaints as a percent of total pieces mailed increase to 0.16 percent. If you do not confirm, please explain why.

RESPONSE:

a. Not confirmed. Silver and Black Illustrated is published 24 times per year.

The approximate total number of copies of Silver and Black mailed in 1999 was 8,000 times 24 or 192,000.

b. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c)

c. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c)

USPS/PFPA T1-6

a. Based on the circulation of 9,000 for Jets Confidential provided by you on page 2 of your testimony and the assumption that you mail 31 issues, please confirm that the total number of Jets Confidential mailed is 279,000 for calendar year 1999. If you do not confirm, please explain why, and provide your estimate of the number of copies mailed.

b. Based on 96 reader complaints for Jets Confidential in calendar year 1999 (including 2 complaints from foreign destinations), please confirm that reader complaints are 0.03 percent of total pieces mailed of 279,000. If you do not confirm, please explain why, and provide your estimate of the complaints as a percentage of pieces mailed.

c. Also, please confirm that if the number of issues for Jets Confidential is 25 instead of 31, the mailed pieces reduce to 225,000 and reader complaints as a percent of total pieces mailed increase to 0.05 percent. If you do not confirm, please explain why.

RESPONSE:

a. Not confirmed. Jet Confidential is published 24 times per year. The approximate total number of copies of Jet Confidential mailed in 1999 was 7,000 times 24 or 168,000.

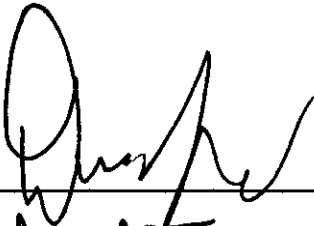
b. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

c. Not confirmed. Please see my responses to USPS/PFPA T1-1(b) and (c).

DECLARATION

I, David M. Jones, declare under penalty of perjury that the answers to interrogatories of the United States Postal Service, USPS/PFPA T-1- 1-6 are true and correct to the best of my knowledge, information and belief.

Executed 6-27-00



David Jones

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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 'T. Rush', with a stylized, cursive flourish at the end.

TONDA F. RUSH