

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

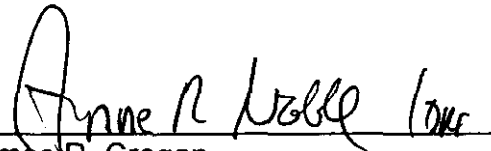
Docket No. R2000-1

RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS GLICK TO FIRST SET OF INTERROGATORIES
OF UNITED PARCEL SERVICE
(UPS/MPA-T2-1-2)

(JULY 3, 2000)

Magazine Publishers of America, Inc. hereby provides the responses of witness Glick to the following interrogatories of United Parcel Service: UPS/MPA-T2-1-2, filed on June 19, 2000. The interrogatories are stated verbatim and are followed by responses.

Respectfully submitted,



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**RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA WITNESS GLICK
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/MPA-T-2-1-2)**

UPS/MPA-T-2-1. On page 17, lines 1-15, of your testimony, you quote from the Periodicals Operations Review Team's "Team Report" at 25 describing the bundle breakage problem and suggesting ways in which the Postal Service might improve its processing of bundles.

- (a) List the identities of the organizations participating in the Periodicals Operations Review Team and the number of Team members from each listed organization.
- (b) Confirm that the summaries and opinions reflected in the Team Report generally reflect those of the Periodicals Operations Review Team as a whole. If you do not confirm, explain.
- (c) Confirm that the portion of the Team Report cited on page 17, lines 1-15, referenced above reflect the views and opinions of the Periodicals Operation Review Team as a whole.

Response:

Please refer to witness Cohen's response to UPS/MPA-T1-2(b).

UPS/MPA-T2-2. On page 17, lines 7-13, of your testimony, you cite the Operations Review Team Report as stating, "The main problem [resulting in bundle breakage] is with the pallet dumping and subsequent bundle travel on highly congested feed belts...Some facilities have developed better techniques than others for minimizing SPBS bundle breakage, e.g., by carefully controlling the bundle volume dumped on the feed belt at any one time."

- (a) Is it your understanding that the frequency of bundle breakage is positively associated with the volume of bundles being processed? Explain your answer fully.
- (b) If you answer to (a) is yes, also consider page 17, lines 17-20, of your testimony, where you cite the Team Report as stating, "The cost impact of SPBS bundle breakage may be magnified, because SPBS employees choose to key individual pieces in such [broken] bundles rather than to salvage partially broken bundles." In light of your response to part (a) and the fact that SPBS employees key individual pieces of broken bundles, is it your understanding that total piece handlings, as recorded by SPBS machine counts, increase disproportionately with the actual number of bundles arriving at SPBS machines for processing?

Response:

a. No. My understanding is that there is no relationship between the use of these "better techniques" and bundle volume. At the MTAC study site visit that I attended, I noticed that the operator often dumped bundles from pallets all at once with no resulting benefit. There was no benefit because the bundles did not arrive at the keying station any faster than if the operator had dumped the bundle from the pallet carefully over a slightly longer period of time.

b. No.

DECLARATION


I, Sander Glick, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Sander Glick

Date: 7/3/2000

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 the Commission's Rules of Practice.



Anne R. Noble

Washington DC
July 3, 2000