

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

RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS CROWDER TO QUESTIONS RAISED AT THE HEARING

(July 27, 2000)

The Magazine Publishers of America hereby submits the response of witness Crowder to questions raised by counsel for NAA at the hearing on July 20, 2000.

Respectfully submitted,



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RESPONSE OF MPA WITNESS CROWDER TO QUESTIONS RAISED AT THE HEARING

At Tr. 16311-12, counsel for NAA requested a count of tallies for each of the tally combinations listed in witness Crowder's response to NAA/MPA-T5-1.

RESPONSE:

The following is a count of the Point of Delivery tallies listed in the response to NAA/MPA-T5-1:

Point of Delivery Location Load Tallies With Confused Codes	
Finger @ Delivery (LLV detail and Dismount delivery type)	27
Travel b/t Delivery (LLV detail)	16
Parcel (walk flat detail)	4
Travel b/t Delivery (walk flat detail)	8
Travel b/t Delivery w/sort (walk flat detail)	2
Accountable (walking detail)	2
Travel b/t Delivery (#1 Box detail)	2
Walking (Central Inside detail)	2
Delivery/Collection (walking detail)	1
Walking (Central Outside detail)	2
Walking (walk flat detail)	1
No Access to Box (parking unavailable detail)	1
No Access to Box (#1 Box detail)	1
Travel b/t Delivery (Central Outside)	1
Accountable (walk flat detail)	2
No Access to Box (N/A detail)	1
Travel b/t Delivery (1 Hand Slam detail)	1
Hardship (LLV detail for Dismount delivery type)	1
No Access to Box (Central Inside detail)	1
Parcel (walking detail)	1
Travel b/t Delivery (Walk obstructed detail)	1
Travel b/t Delivery (Drop to customer detail)	1
No Access to Box (Multiple box type detail)	1
Delivery/Collect (LLV detail for Dismount delivery type)	1
Setup (LLV or Jeep detail for Park & Loop or Dismount delivery type)*	8
Finger@Delivery or Setup (LLV or Jeep detail for Central delivery type)*	5
On Route Location Load Tallies With Confused Codes:	
Delivery/Collection (walking detail)	1
Accountable (walk flat detail)	7
Finger @ Delivery (walk flat detail)	2
Parcel (walk flat detail)	52
Walking (walk flat detail)	5
Delivery/Collection (walk flat detail)	3

Vehicle and Park Point Location Load Tallies With Confused Codes	
Finger @ Delivery (LLV detail for Central delivery type)	5
Delivery/Collection (various detail codes for Dismount delivery type)	26
Delivery/Collection (for various detail codes for Park & Loop delivery type)	5
No Access to Box (#1 Box detail)*	1
Travel b/t Delivery (Drop to customer detail for Dismount delivery type)*	2
Finger @ Delivery (LLV detail for Dismount delivery type)*	30
* Additions to Original Response to NAA/MPA-T5-1	
Total	233

Since the above listing may not be complete, an additional tally count was made which indicates that 330 Load Tallies have a Vehicle or In Vehicle at Stop Location Code, 50 Load Tallies have a Travel, Walking, or No Access to Box Activity Code, and 223 Load Tallies have a Vehicle, Walking, Walk, Flat, Walk Obstructed Activity Detail Code.

The following is a count of the Load tallies by Location Code as listed in the original response to NAA/MPA-T5-4:

Location Codes Assigned to Load Time	
In Vehicle at Stop (Curb delivery code)	1
Miscellaneous (Curb and Dismount delivery codes)	2
N/A (N/A and Central delivery code)	2
On Route (all delivery codes except N/A)	190
Other Route (Curb delivery code)	3
Park Point (Park & Loop delivery code)	1
Point of Delivery (all delivery codes except N/A)	16046
Vehicle (all delivery codes except N/A)	329
TOTAL	16574

As explained in my testimony and my response to NAA/MPA-T5-1, the significance of these tallies goes beyond their number, as they are indicative of confusion and/or inconsistency by the data collectors about the meaning of the terms point of delivery and delivery/collect, and raise serious questions whether their interpretations of carrier activities are consistent with the postal costing definitions of these activities. The larger unquantifiable problem, with respect the far larger number of tallies that appear on their face to represent load activity, is the extent to which these

kinds of non-load activities were ignored or overlooked by the data collectors in recording activities near the delivery point as being at the delivery point, with the "Delivery/ Collect" and receptacle code entries masking the true activity.

DECLARATION

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


ANTOINETTE CROWDER

Dated: July 27, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Thomas W. McLaughlin

July 27, 2000