

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

RECEIVED
OCT 4 4 31 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO WITNESS TO WILLIAM P. TAYMAN, JR.
(MPA/USPS-T6-1-4)
(October 4, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to witness William P. Tayman, Jr.

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

James Pierce Myers
Attorney at Law
1617 Courtland Road
Alexandria, VA 22306
Phone: 703-660-1002
Fax: 703-660-1037
jpm@piercemyers.com

MPA/USPS-T6-1. In the section of USPS-LR-J-49 titled "AUTOMATED FLAT SORTING MACHINE (AFSM 100): FIRST BUY (175) AND SECOND BUY (362)", it briefly describes some of the assumptions and methods you used to quantify the cost savings that will result from the second AFSM 100 buy:

The site-specific savings are based on productivity increases expected in moving existing flat volumes from the FSM 881, FSM 1000, and manual operations in the plants and delivery offices to the AFSM 100. Additional workhours were added for taking flat mail that does not arrive in Postal Service standard flat tubs and placing it into mail prep carts that will be delivered with the AFSM 100s.

(a) Please provide all calculations underlying your estimate of the cost savings from AUTOMATED FLAT SORTING MACHINE (AFSM 100): FIRST BUY (175) AND SECOND BUY (362).

(b) Please provide all Decision Analysis Reports that the Postal Service has produced regarding AFSM 100s.

(c) What percentage of mail that will be processed on the second buy AFSM 100s was processed manually in FY 2000? If you cannot provide an exact estimate, please provide your best approximation.

(d) What percentage of mail that will be processed on the second buy AFSM 100s was processed on FSM 881s in FY 2000? If you cannot provide an exact estimate, please provide your best approximation.

(e) What percentage of mail that will be processed on the second buy AFSM 100s was processed on FSM 1000s in FY 2000? If you cannot provide an exact estimate, please provide your best approximation.

MPA/USPS-T6-2. In the section of USPS-LR-J-49 titled "AUTOMATED FEEDERS & OCRs", you briefly describe the method you used to quantify the cost savings that will result from adding automated feeders and OCRs to FSM 1000s

(a) Please provide all calculations underlying your estimate of the cost savings from adding automated feeders and OCRs to FSM 1000s.

(b) Please provide all Decision Analysis Reports that the Postal Service has produced regarding the retrofit of FSM 1000s with automated feeders and OCRs.

MPA/USPS-T6-3. In Exhibit E of USPS-LR-J-49, you show cost savings from the deployment of Bundle Collators.

(a) Please provide all calculations underlying your estimate of the cost savings from Bundle Collators.

(b) Please provide all Decision Analysis Reports that the Postal Service has produced regarding Bundle Collators.

MPA/USPS-T6-4. On page 62 of your testimony, you note that TFP grew by 2.5 percent in FY 2000, is on pace to grow by 2.0 percent in FY 2001, and is projected to grow by 1.1 percent in FY 2002.

(a) If the Postal Service's FY 2002 cost and volume forecasts (as well as all underlying forecasting assumptions) come to pass, how much higher would USPS total factor productivity (TFP) be in FY 2002 than in FY 2001?

Docket No. R2001-1


(b) If the Postal Service's FY 2002 and TYBR cost (excluding contingency) and volume forecasts (as well as all underlying forecasting assumptions) come to pass, how much higher would USPS TFP be in TYBR than in FY 2002?

(c) If the Postal Service's FY 2002 and TYAR cost (excluding contingency) and volume forecasts (as well as all underlying forecasting assumptions) come to pass, how much higher would USPS TFP be in TYAR than in FY 2002?

(d) Please provide detailed documentation regarding how the Postal Service calculates TFP.

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 Rule 12 of the rules of practice.



James Pierce Myers
Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

October 4, 2001
Alexandria, VA