

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, 2001 )

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO WITNESS LESLIE SCHENK  
(MPA/USPS-T43-1-3)  
(October 10, 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 Leslie Schenk

Respectfully submitted,

  
James Pierce Myers

Counsel for  
MAGAZINE PUBLISHERS OF AMERICA, INC.

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**MPA/USPS-T43-1.** In Section II of your testimony, you discuss your methodology for calculating cost savings from reduced bundle breakage.

(a) Please confirm that the Postal Service recently promulgated new standards for the packaging of flats, that these new standards became effective on July 1, 2001, and that these standards were designed to improve package integrity. If not confirmed, please explain fully.

(b) Please refer to the "Additional Efforts To Reduce Package Breakage and Associated Costs" section of the Federal Register notice titled "Preparation Changes for Securing Packages of Mail." (February 20, 2001, page 10870) and confirm that the mailing industry and the Postal Service are working on multiple fronts to improve package integrity. If not confirmed, please explain fully.

(c) Has the Postal Service undertaken a data collection effort to precisely quantify the extent to which these joint USPS-mailing industry efforts have improved package integrity? If so, please provide the data. If not, does the Postal Service have plans to collect this information and when will this data collection occur?

**MPA/USPS-T-43-2.** Please refer to your analysis of Test Year cost savings for bundle breakage reduction for flats mail, USPS-LR-J-118, and USPS-LR-J-61.

(a) Please confirm that running USPS-LR-J-61 without piggyback factors produces the test year unit costs as provided in USPS LR-J-118. If you cannot confirm, please explain.

(b) Please describe the steps necessary to be taken to eliminate the piggyback factors from USPS-LR-J-61.

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(c) Please provide references to all cells in USPS-LR-J-61 that must be adjusted to replicate the unit cost figures you used in USPS-LR-J-118 and explain how they must be adjusted.

**MPA/USPS-T43-3.** Please refer to Table 1 of USPS-LR-J-119 and Docket No. R2000-1, USPS-LR-I-307, page 4 and Docket No. R2000-1, LR95del.xls, worksheet ecr splits.


(a) Please confirm that the costs shown in the column titled "Carrier In-Office Costs" do not include any piggyback costs. If not confirmed, please explain fully.

(b) Please confirm that volumes in the "Total Volumes" column are total RPW volumes.

(c) Does LOT sequencing of Carrier Route flats affect rural carrier costs in addition to city carrier costs? Please explain your response fully.

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.

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

October 10, 2001  
Alexandria, VA.