

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-T43-4-5)  
(October 19, 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-T43-4.** In Section II of your testimony, you discuss your methodology for calculating cost savings from reduced bundle breakage.

(a) Please confirm that reducing bundle breakage, as modeled using USPS-LR-J-61, reduces costs by replacing piece sorting (of pieces in broken bundles) with bundle sorting (of intact bundles), which is a less expensive activity on a per-piece basis. If not confirmed, please explain fully.

(b) Please confirm that the cost savings, as modeled using USPS-LR-J-61, from presorting also results from replacing piece sorting with bundle sorting, which is a less expensive activity on a per-piece basis. If not confirmed, please explain fully.


**MPA/USPS-T43-5.** Please refer to Section III of your testimony.

(a) Please confirm that the cost savings from the LOT requirement for Periodicals Carrier Route Basic mail reduce city carrier in-office costs by increasing the efficiency by which carriers can case Carrier Route mail. If not confirmed, please explain fully.

(b) Please confirm that implementing the LOT requirement does not require significant changes to city-carrier operational procedures. If not confirmed, please explain 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 19, 2001  
Alexandria, VA.