

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 ALTAF TAUFIQUE (MPA/USPS-T34-10-12)
(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 Altaf Taufique.

Respectfully submitted,



James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

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MPA/USPS-T34-10. Please refer to oc01.xls, worksheets Calc. of new Cells and Rev. Adj+Ed. Cont.

(a) Please confirm that the Postal Service estimates that approximately nine percent of TYAR Periodicals Outside-County mail volume will be entered at the DADC. If not confirmed, please explain fully.

(b) Please confirm that currently only 7.6 percent of Periodicals Outside-County mail is entered at the DADC. If not confirmed, please explain fully.

(c) Please confirm that the difference between these two figures (approximately 1.4 percent of Periodicals Outside-County volume) represents mail that is (i) currently entered at OSCFs and OAOs in the DADC service territory; and (ii) expected to be entered at the DADC in the Test Year. If not confirmed, please explain fully.

(d) Please confirm that to qualify as a DADC piece, the mail must be entered at the DADC facility. If not confirmed, please explain fully.

(e) Please confirm that, ceteris parabis, the transportation and mail processing cost for a piece entered at the DADC facility is lower than the transportation and mail processing cost for a piece entered at an OSCF or OAO in the DADC service territory. If not confirmed, please explain fully.

(f) Does the Postal Service typically transport Periodicals Outside-County mail that is entered at the OSCF (within the DADC service territory, but not the DSCF service territory) to the DADC? Please explain your answer fully.

(g) Does the Postal Service typically transport Periodicals Outside-County mail that is entered at an OAO (within the DADC service territory, but not the DSCF

service territory) first to the OSCF and then on to the DADC? Please explain your answer fully.

MPA/USPS-T34-11. Please refer to oc01.xls, worksheets Calc. of new Cells and Rev. Adj+Ed. Cont. In particular, please refer to the Postal Service's estimate that approximately 9.2 percent of Periodicals Outside-County mail volume will pay the DADC rate in the Test Year.

(a) Please confirm that the 9.2 percent figure is an aggregate figure for the entire Periodicals Outside-County subclass.

(b) What percentage of TYAR Periodicals Nonprofit pieces will qualify for the DADC rate? If you cannot provide an exact estimate, please provide your best guess.

(c) What percentage of TYAR Periodicals Regular pieces will qualify for the DADC rate? If you cannot provide an exact estimate, please provide your best guess.

MPA/USPS-T34-12. Please refer to oc01.xls, worksheet Calc. of new Cells. In particular, please refer to the Postal Service's estimate that approximately 69 percent of Periodicals Outside-County mail volume is currently palletized.


(a) Please confirm that the 69 percent figure is an aggregate figure for the entire Periodicals Outside-County subclass. If not confirmed, please explain fully.

(b) What percentage of Periodicals Nonprofit pieces is palletized?

(c) What percentage of Periodicals Regular pieces is palletized?

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 19, 2001
Alexandria, VA