

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 UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(MPA/USPS-T41-2-6)
(October 26, 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 United States Postal Service witness Loetscher (USPS-T-41).

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-T41-2. Please refer to MPA/USPS-T34-3, Table 2. For each row in this table, please identify the number of publications that are local publications. Please also describe the source of these numbers.

MPA/USPS-T41-3. Please refer to MPA/USPS-T34-2, Table 1. For each row in this table, please identify the number of publications that are local publications. Please also describe the source of these numbers.

MPA/USPS-T41-4. Please refer to MPA/USPS-T34-3, Table 2.

(a) Please confirm that the majority of pieces in mailings of publications with issue sizes above one million pieces are almost 100 percent palletized. If not confirmed, please explain fully.

(b) Please confirm that the majority of pieces in mailings of publications with issue sizes between 500,000 and one million pieces are almost 100 percent palletized. If not confirmed, please explain fully.

(c) Please confirm that the majority of pieces in mailings of publications with issue sizes between 200,000 and 500,000 pieces are almost 100 percent palletized. If not confirmed, please explain fully.

MPA/USPS-T41-5. Please refer to your response to MPA/USPS-T34-3 where you state, "Estimated issue size used to produce this table is the ratio of PERMIT system annual volume to reported issue frequency. This estimate will produce erroneous estimates for numerous reasons." Please provide your expert opinion about the extent to which the total mail volume, total weight, and advertising weight by issue size are erroneous.

(a) By what percentage do you think these figures are likely to be wrong? Please explain your answer fully.

(b) Do you think your analysis would tend to overstate issue size or understate issue size? Please explain your answer fully.

(c) If you estimated that the issue size for a particular publication was greater than 1 million, is it likely that the issue size was actually less than 500,000?

(d) If you estimated that the issue size for a particular publication was greater than 500,000, is it likely that the issue size was actually less than 200,000?

MPA/USPS-T41-6. Please refer to your response to MPA/USPS-T34-4 where you state, "The Postal Service produced estimates of the cost savings that would result from increasing the piece minimum of Carrier Route sacks to 24 pieces. The estimated cost savings and underlying calculations are presented in LR-I-332 in Docket No. R2000-1."

(a) Are the costs presented in USPS-LR-I-332 adjusted to match Cost and Revenue Analysis (CRA) costs?

(b) If your response to subpart (a) of this interrogatory is affirmative, where in USPS-LR-I-332 does the Postal Service adjust the costs to match CRA costs?

(c) If the costs presented in USPS-LR-I-332 are not adjusted to match CRA costs, has the Postal Service or any of its contractors performed any analyses (whether preliminary or final) to determine the appropriate proportional and fixed CRA adjustment factors that should be used to adjust the costs presented in USPS-LR-I-332 to match CRA costs?

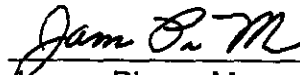
(d) If your response to subpart (c) of this interrogatory is affirmative, please provide the proportional and fixed CRA adjustment factors resulting from these

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analyses and provide all underlying calculations in an electronic spreadsheet format.

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 26, 2001
Alexandria, VA