

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

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POSTAL RATE AND FEE CHANGES, 1997)
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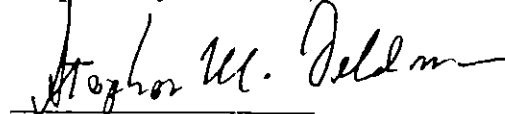
SEP 5 2 58 PM '97

Docket No. R97-1
NOTARIAL COMMISSION
OFFICE OF THE SECRETARY

**THE AMERICAN BUSINESS PRESS' FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO USPS WITNESS TAUFIQUE
(ABP/USPS-T34-16-22)**

Pursuant to Special Rules of Practice Section 2D, the American Business Press hereby submits the attached follow-up interrogatories and requests for production of documents to USPS Witness Taufique (ABP/USPS-T34-16-22). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



David R. Straus, Esq.

Stephen M. Feldman, Esq.

THOMPSON COBURN

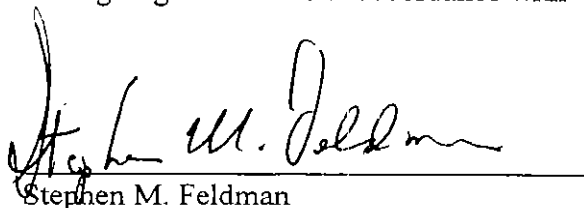
700 14th Street, N.W., Suite 900

Washington, D.C. 20005

Counsel for the American
Business Press

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.


Stephen M. Feldman

Dated: September 5, 1997

FOLLOW-UP INTERROGATORIES
OF AMERICAN BUSINESS PRESS (ABP)
TO USPS WITNESS TAUFIQUE (USPS-T-34)

ABP/ USPS-T-34-16

[a] In reference to your response to ABP/USPS-T-34-5[a], you did not specifically elaborate on the meaning of the term "rate shock" as used in your testimony. Is the definition of "rate shock" as you refer to it in your testimony and as you responded to T-34-5[a] increases for rate cells that exceed 10%?

[b] Was the decision to "keep the increase in each cell below 10 percent" a management decision or your decision? If it was a management decision, who made the decision and what is the rationale for that decision?

ABP/USPS-T34-17

[a] Please clarify your response to ABP/USPS- T-34-7[c] insofar as you state that if the Postal Service reinstitutes SCF sacks, all mail in SCF sacks would be eligible for Basic rates yet USPS currently permits automation-qualified 3- and 5- digit sorted periodical mail in ADC sacks to be eligible for 3 and 5digit discounts. Given that situation, why would SCF sacks be treated any differently than ADC sacks, especially since the vast majority of ADCs are SCFs?

[b] If incoming primary and secondary distribution are done at an SCF to sort periodical pieces in 3- and 5-digit packages to the appropriate carrier routes, why would such pieces, if enclosed in a sack opened at that SCF, pay Basic per-piece rates?

ABP/USPS-T-34-18

[a] Your answer to ABP/USPS-T-34-8[d], which explains the non-performance of weight and cost studies by USPS, states that USPS could not "complete" all studies it might have wished to complete because of "resource constraints." Did USPS, since the R94-1 opinion of the Postal Rate Commission, begin any studies that examine the effect of weight on periodical costs?

[b] Identify all studies in all rate and classification proceedings since R94-1 that examine the effect of weight on cost that USPS has performed, completed and presented as either testimony, exhibits to testimony, or library references. Please identify the docket number of each such proceeding, the witness sponsoring the testimony (if any) concerning a weight/cost study, and the subclass, rate category or special service concerning which the weight/cost study was completed.

[c] If studies about weight for other subclasses or rate categories other than second-class or periodicals were completed since the beginning of 1996, why were those studies considered to have greater priority than the periodical studies repeatedly called for by the Commission over a ten-year period?

ABP/USPS-T-34-19

Based on your response to ABP/USPS-T-34- 11, can it be concluded that the nonadvertising pound rate in periodical regular rate subclass was constructed using a weight percentage for non-advertising pounds of 54.5%, and not a percentage of 58.7% which is derived according to your response from a measure of the actual column inches?

ABP/USPS -T-34-20

Your response to ABP/USPS-T-34-12 indicates that both pound and piece rates for dropshipped periodicals were reduced in your proposed rate design. On what cost evidence filed so far in this case did you decide to reduce pound rates for avoided *non-transportation*, distance-related costs, instead of applying those savings only to piece rates?

ABP/USPS-T-34-21

[a] Referring to your response to ABP/USPS- T-34-13, why are there no distance-related costs allocated to intra-SCF mail, if as seems likely, postal transportation from SCFs to delivery facilities within the SCF area takes place on routes of varying lengths? If you do not agree that trips within the SCF area do have different lengths, please explain your position.

[b] In connection with part [a] above, do you agree that there can be point to point routes within an SCF as short as a mile and as long as distances in excess of 100 miles?

ABP/USP-T-34-22

In question ABP-USPS-T-34-15, ABP asked you if the reference to "0.01 cents" at p. 16, lines 8-9, of your testimony should be corrected to "1 cent." You answered simply "No." As a result, we checked your workpaper W/P RR-I, cell 39, and will re-ask the question as follows: "Should the reference to ".01 cents" be corrected to ".1cents"?