

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE MAGAZINE PUBLISHERS OF AMERICA
REDIRECTED FROM WITNESS TAUFIQUE
(MPA/USPS-T34—20(D-F))**

The United States Postal Service hereby provides its response to the following interrogatory of the Magazine Publishers of America redirected from witness Taufique: MPA/USPS-T34—20(d-f), filed on November 1, 2001.

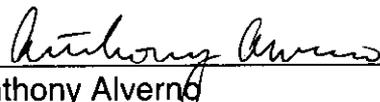
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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Attorney

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November 15, 2001

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INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
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MPA/USPS-T-34-20. Please refer to USPS-LR-J-107, OCOI .xls, worksheet Pound Data-Adv and set cells D47-D49 of this worksheet equal to 0.

* * * * *

(d) Please confirm that the unit cost per pound for transporting periodicals from an Origin Associate Office (OAO) that is not in the DSCF service territory to the DADC is likely to be similar to the unit cost per pound for transporting periodicals from the DADC to the DDU. If not confirmed, please explain fully.

(e) Please confirm that the unit cost per pound for transporting periodicals from an Origin Sectional Center Facility (OSCF) to the DADC is likely to be similar to the unit cost per pound for transporting periodicals from the DADC to the DSCF. If not confirmed, please explain fully.

(f) Please confirm that the unit cost per pound for transporting periodicals from an OAO within the DSCF service territory to the DSCF is likely to be similar to the unit cost per pound for transporting periodicals from the DSCF to the DDU. If not confirmed, please explain fully.

RESPONSE

(d)-(f) These assumptions regarding the comparability of transportation costs cannot be confirmed. Assumptions regarding the availability, nature of the transportation on each leg, and capacity utilization on each leg would need to be made in order to claim that: (i) the DADC to DDU transportation cost is a good proxy for the OAO to DADC transportation cost; (ii) the DADC to DSCF transportation cost is a good proxy for the OSCF to DADC transportation cost; or (iii) the DSCF to DDU is a good proxy for the OAO to DSCF transportation.

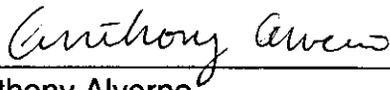
The costs could vary for a number of reasons. For example, partly as a result of accommodating mailer dropshipments and postal plant load patterns, and partly in order to meet service targets, the number, sizes and relative fullness of available trucks traveling from origin facilities to transfer hubs or other larger distribution facilities would not be expected to be matched by the same

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number, sizes and relative fullnesses of trucks from the transfer hubs or other upstream facilities traveling to downstream facilities. The underlying characteristics of each transportation leg depend on the nature of the characteristics of the contract cost for that transportation segment. It may not be true that trips from A to B and trips from B to A share like truck sizes, trip frequencies, transit times, etc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anthony Alverno

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