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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001–1

RESPONSES OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC. REDIRECTED FROM WITNESS KINGSLEY (MPA/USPS-T39-2-7)

The United States Postal Service hereby provides the responses of United

States to the following interrogatories of Magazine Publishers of America, Inc.

redirected from witness Kingsley: MPA/USPS-T39-2-7, filed on November 13, 2001.

Each 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

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3078, Fax –5402 November 27, 2001

MPA/USPS-T39-2 Please complete Table 1 by providing the typical numbers of crossdocks that would be required for a 3-digit container that is entered at the specified facilities. For example, if the typical mail flow for a 3-digit container that is entered at an Origin Area Distribution Center (OADC) is to be crossdocked at that facility, at the Origin Bulk Mail Center (OBMC), at the Destination Bulk Mail Center (DBMC), and then again at the Destination Area Destination Center (DADC) before finally being broken down at the Destination Sectional Center facility (DSCF), enter a 2 in the "Number of Bulk Mail Centers" column, a 2 in the "Number of Area Distribution Center Facilities (SCFs)" column in the "OADC Not In Service Territory of DBMC" row.

Response:

MPA/USPS-T39-3 Assume that a 3-digit sack of periodicals is entered at an Origin Sectional Center Facility (OSCF) within the Destination Area Distribution Center (DADC) service territory.

(a) What is the probability that this 3-digit sack will be transported directly to the destination Sectional Center Facility (SCF) from the OSCF? Please explain your response fully.

(b) What is the probability that this 3-digit sack will be transported directly to the Destination Delivery Unit (DDU) from the OSCF? Please explain your response fully.

(c) What is the probability that this 3-digit sack will be transported directly to the DADC from the OSCF? Please explain your response fully.

Response:

MPA/USPS-T-39-4 Assume that a 3-digit pallet containing periodicals is entered at an Origin Sectional Center Facility (OSCF) within the Destination Area Distribution Center (DADC) service territory.

(a) What is the probability that this 3-digit pallet will be transported directly to the Destination Sectional Center Facility (DSCF) from the OSCF? Please explain your response fully.

(b) What is the probability that this 3-digit pallet will be transported directly to the Destination Delivery Unit (DDU) from the OSCF? Please explain your response fully.

(c) What is the probability that this 3-digit pallet will be transported directly to the DADC from the OSCF? Please explain your response fully.

Response:

MPA/USPS-T39-5 Assume that a 3-digit sack of periodicals is entered at a Destination Area Distribution Center (DADC). What is the probability that this 3- digit sack will be transported directly to the Destination Delivery Unit (DDU) from the DADC? Please explain your response fully.

Response:

MPA/USPS-T39-6 Assume that a 3-digit pallet containing periodicals is entered at a Destination Area Distribution Center (DADC). What is the probability that this 3-digit pallet will be transported directly to the Destination Delivery Unit (DDU) from the DADC? Please explain your response fully.

Response:

MPA/USPS-T39-7 Please confirm that periodicals mail that is entered at the Destination Delivery Unit, Destination Sectional Center Facility, and Destination Area Distribution Center does not incur plant load costs. If not confirmed, please explain fully.

Response:

A large mailing, with the vast majority as destination entered, does not incur plant load

costs for the dropshipped portion. However, the residual portion of the mailing may

have included plant load volumes.

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.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 27, 2001