

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

FOLLOW-UP INTERROGATORIES OF MAGAZINE PUBLISHERS OF
AMERICA, INC. TO UNITED STATES POSTAL SERVICE WITNESS
PICKETT (MPA/USPS-T17-6-8)
(December 4, 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 Pickett (USPS-
T-17).

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

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MPA/USPS-T17-6. Please refer to your response to MPA/USPS-T17-2(a) where you state, "Amtrak rates per linear foot vary depending on the service purchased." Please refer further to your response to MPA/USPS-T17-1(c)(i) where you state, "If you are referring to the rates per linear foot Amtrak charges the Postal Service, I am told that these rates did not change from 1998 to 2000."

(a) Please confirm that it is your testimony that the rate per linear foot for every "service purchased" from Amtrak was exactly the same in FY 2000 as it was in FY 1998. If not confirmed, please explain your response fully.

(b) If you cannot confirm subpart (a) of this interrogatory, how much higher (expressed on a percentage basis) were the rates per linear foot charged for Amtrak in FY 2000 than in FY 1998? Please explain your response fully and provide all of your underlying calculations in an electronic spreadsheet format.

MPA/USPS-T17-7. Please refer to your response to MPA/USPS-T17-5(a) where you state, "What I indicated in my response was that Amtrak sometimes is less expensive than other surface transportation alternatives and sometimes it provides better service. It is my understanding that Amtrak can be less expensive than inter-BMC [Bulk Mail Center] highway."

(a) Please provide any additional information that you have that demonstrates that "Amtrak can be less expensive than inter-BMC highway."

(b) For what percentage of services that the Postal Service purchases from Amtrak is Amtrak less expensive than inter-BMC highway? Please explain your response fully and provide all underlying calculations in an electronic spreadsheet format.

MPA/USPS-T17-8. Please refer to your response to MPA/USPS-T17-5(b) where you state, "What I indicated in my response was that Amtrak sometimes is less

expensive than other surface transportation alternatives and sometimes it provides better service. It is my understanding that Amtrak generally provides superior service than freight rail and may provide superior service to inter-BMC [Bulk Mail Center] highway in some circumstances.”

(a) Please provide any additional information that you have that demonstrates that “Amtrak generally provides superior service than freight rail.”

(b) Please provide any additional information that you have that demonstrates that “Amtrak...may provide superior service to inter-BMC highway in some circumstances.”

(c) For what percentage of services that the Postal Service purchases from Amtrak does Amtrak provide service superior to freight rail?

(d) For what percentage of services that the Postal Service purchases from Amtrak does Amtrak provide service superior to inter-BMC highway transportation?

(e) In your opinion, does Amtrak generally provide service superior to inter-BMC highway transportation? If so, please provide any additional information that you have that demonstrates that Amtrak generally provides service superior to inter-BMC highway transportation.

(f) Please provide any information that you have that demonstrates that the amount of Periodicals Outside-County mail (expressed in terms of either number of pieces, weight or cubic feet) transported on Amtrak was higher in FY 2000 than in FY 1998.

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.

December 4, 2001
Alexandria, VA