

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  
WITNESS TAUFIQUE TO INTERROGATORY OF  
THE MAGAZINE PUBLISHERS OF AMERICA, INC.,  
REDIRECTED FROM WITNESS MAYES  
(MPA/USPS-T23-1(I))

The United States Postal Service hereby provides the response of witness Taufique to the following interrogatory of the Magazine Publishers of America, Inc.: MPA/USPS-T23-1(i), filed on November 20, 2001, and redirected from witness Mayes.

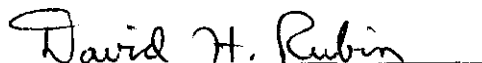
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
December 4, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE  
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
REDIRECTED FROM WITNESS MAYES

**MPA/USPS-T23-1.** Please refer to your response to MPA/USPS-T34-5(b) where you state, "For non-destination SCF [Sectional Center Facility] Zone 1 & 2 pieces entered at the DBMC [destination bulk mail center] or destination transfer hub, it is assumed that 80 percent will be transported directly to the DSCF and 20 percent of the pieces will first travel through an intermediate facility (assumed to be the destination ADC [Area Distribution Center]) then be cross-docked to the DSCF."

- (i) Please confirm that the advertising zone differentials in the Periodicals Outside-County subclass rate design do not reflect any nontransportation cost differences between lower zone mail (e.g., zones 1 and 2) and higher zone mail (e.g., zone 8). If not confirmed, please explain your response fully.

**RESPONSE:**

- (i) Confirmed.

**DECLARATION**

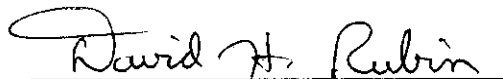
**I, Altaf H. Taufique, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.**

  
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**Dated: DECEMBER 4, 2001**

**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.

  
David H. Rubin

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