

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

RECEIVED
DEC 11 3 32 PM '01
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
MAYES
(MPA/USPS-T23-3)
(December 11, 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 Mayes (USPS-
T-23).

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

James Pierce Myers
Attorney at Law
1617 Courtland Road
Alexandria, VA 22306
Phone: 703-660-1002
Fax: 703-660-1037
jpm@piercemyers.com

MPA/USPS-T23-3. Please refer to your response to MPA/USPS-T23-1(f) where you state, "However, typically there is direct transportation linking ADCs [area distribution centers] within the same DBMC [destination bulk mail center] service area." Please refer further to your response to MPA/USPS-T23-1(h): "It is also possible that, in the interest of service, direct transportation exists between the facility of origin and the destination ADC or destination SCF [sectional center facility] for the Zone 5 piece, whereas the Zone 1&2 piece might have to travel through the DBMC, DADC or DSCF."

(a) Is the typical transportation path for a Zone 5 sacked piece that is entered at an origin ADC that is not in the DBMC service territory as follows?

- (i) United States Postal Service (USPS) transports sack from origin ADC to origin transfer hub (OTH).
- (ii) USPS transports sack from OTH to destination transfer hub (DTH.)
- (iii) USPS transports sack from DTH to DADC or DSCF where container is opened.

If this is not the typical transportation path, please describe the typical path.


(b) Is the typical transportation path for a Zone 5 sacked piece that is entered at an origin transfer hub (OTH) as follows?

- (i) USPS transports sack from OTH to DTH.
- (ii) USPS transports sack from DTH to DADC or DSCF where sack is opened.

If this is not the typical transportation path, please describe the typical path.

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 11, 2001
Alexandria, VA