

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 MAYES TO
INTERROGATORY OF THE MAGAZINE PUBLISHERS OF AMERICA
(MPA/USPS-T23—3)**

The United States Postal Service hereby provides the response of witness
Mayes to the following interrogatory of the Magazine Publishers of America:

MPA/USPS-T23—3, filed on December 11, 2001.

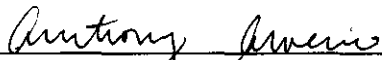
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
December 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYES TO
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

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 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.

RESPONSE

(a) & (b) The flows described above could be considered "typical" for sacked

Periodicals entered outside the service area of the destination transfer hub.

However, it should be noted that these transportation or transfer hubs, usually

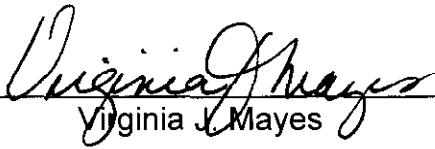
BMCs, are usually only used for the transfer of surface Periodicals that are

containerized to facilitate dock transfers (e.g., palletized) when other direct

surface transportation to the DADC is unavailable.

DECLARATION

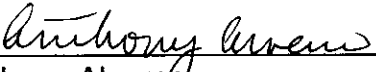
I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


Virginia J. Mayes

Dated: 12-21-01

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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