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

RECEIVED SEP 17 4 33 PH '97 POSTAL RATE COMMISSION OFFICE OF THE SECRETION Docket No. POT-1

POSTAL RATE AND FEE CHANGES, 1997

THE McGRAW-HILL COMPANIES' INITIAL INTERROGATORIES AND OTHER DISCOVERY REQUESTS DIRECTED TO USPS WITNESS MODEN (MH/USPS-T4-1-4)

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Pursuant to the Commission's rules of practice, sections 25-27. The

McGraw-Hill Companies, Inc. submits the following interrogatories and other

discovery requests to United States Postal Service witness Ralph J. Moden.

Respectfully submitted,

Vin Ho W. Bergin Timothy W. Bergin

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Counsel for The McGraw-Hill Companies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document in accordance with Section 12 of the rules of practice.

Timothy W. Bergin

September 17, 1997

MH/USPS-T4-1. With reference to the requirement (DMM E240, adopted after MC95-1) that to be eligible for automation rates, all pieces in a Periodicals mailing must bear an accurate ZIP + 4 barcode (or delivery point barcode), please explain how this requirement has affected the efficiency of handling and processing flats that previously were permitted to be commingled in an automation flat-Periodicals mailing (so long as they bore an accurate 5-digit barcode).

MH/USPS-T4-2. In view of the planned retrofitting of FSM 881s with OCR capabilities, and in light of your response to TW/USPS-T4-12(b), please explain whether the Postal Service will consider reinstating its past policy of permitting flats bearing an accurate 5-digit barcode to comprise up to fifteen percent of a flat Periodicals mailing that is eligible for automation rates. If not, why not?

MH/USPS-T4-3. With reference to your testimony at p.10, lines 19-21, please explain the extent to which the FSM 1000 is capable of processing (a) flats enclosed in polywrap materials other than those currently certified by the Postal Service as acceptable for processing on the FSM 881 (See response to TW/USPS-T4-5(a)), (b) flats weighing more than one pound, or (c) tabloid-sized flats.

MH/USPS-T4-4. Please state the extent to which, and the reasons for why, Periodicals (second-class) mail has been processed with (or after) Standard A (thirdclass) mail at ADCs (or other mail processing facilities other than delivery units) since January 1996, resulting in a delay (loss of preference) in the processing or delivery of Periodicals (second-class) mail, and provide all documents relating to such practice.