

DOCKET SECTION

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

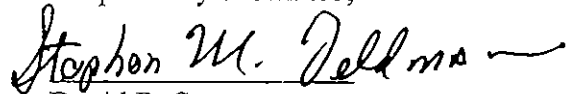
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997 ) Docket No. R97-1

THE AMERICAN BUSINESS PRESS'S FOLLOW-UP  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO USPS WITNESS SECKAR  
(ABP/USPS-T26-18-20)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatories and requests for production of documents to USPS Witness Seckar. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Counsel for the American  
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

Dated: September 25, 1997

  
Stephen M. Feldman

FOLLOW-UP INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS  
OF AMERICAN BUSINESS PRESS (ABP)  
TO USPS WITNESS SECKAR (USPS-T26)  
ABP/USPS-T26-18-20

**ABP/USPS-T26-18**

Your response to ABP/USPS-T26-5 stated that “These costs [actual mail makeup and their associated costs] are generated using, in part, benchmark costs that are comprised of MODS cost pools.”

Please identify which costs of actual mail makeup are not benchmark costs that are comprised of MODS costs pools, the source of those costs, and the location of those costs in your testimony, or in any other documents, testimony, exhibits or library references filed to date by USPS in this case.

**ABP/USPS-T26-19**

(a) Your answer to ABP/USPS-T26-8 states that the “proportional adjustment factor” is used to adjust the weighted modeled costs “so that they reconcile with the proportional CRA-benchmark cost, and is the proportional CRA adjustment factor.” Why is it necessary to “reconcile” benchmark costs that are based on MODS cost pools if MODS cost pools indeed reflect the actual work environment and layout of processing and distribution facilities, BMCs, and non-MODS facilities?

(b) If the “modeled cost” for Periodicals Regular rate must be weighted to be consistent with the CRA benchmark costs, and USPS can collect the benchmark costs through MODS (or through other sources that you have been asked to identify in ABP/USPS-T26-18), what is the purpose of aggregating and calculating “modeled” costs that are unaffected by volumes that are in the final analysis adjusted to a pre-existing figure?

**ABP/USPS-T-26-20**

Referring to your response to ABP/USPS-T-14(b), please explain in your own words why costs that do not vary according to worksharing level (e.g. platform costs) are volume variable costs.