

ORIGINAL

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

**FOLLOW-UP INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA
TO USPS WITNESS WADE
(MPA/USPS-T20-13-15)**

(October 3, 1997)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached follow-up interrogatories to USPS witness Wade (MPA/USPS-T20-13-15).

Respectfully submitted,



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**FOLLOW-UP INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA
TO UNITED STATES POSTAL SERVICE WITNESS WADE**

MPA/USPS-T20-13 Please refer to your response to MPA/USPS-T20-10e and LR-H-261, Spreadsheet Fac_03b, Worksheet Fac_3 and assume three things for a particular row: 1) TOTLDISP (Column P) is equal to 100, 2) PCENDISP (Column V) is equal to 50, and 3) TRIPS (Column EK) is equal to 2.

- a. Please confirm that the spreadsheet would calculate the value for Total Trips Daily (Column GH) for that row as 3.
- b. Please confirm that the entry in Column P indicates that 100 percent of scheduled trips for Facility 3 are dispatches (sorted mail) to stations/branches. If not confirmed, please explain fully.
- c. Please confirm that the entry in Column V indicates that 50 percent of dispatches (sorted mail) to stations/branches for Facility 3 are scheduled on the PS Form 4533. If not confirmed, please explain fully.
- d. Please confirm that if 50 percent of trips are scheduled and 2 trips per day are scheduled, then there are actually four total trips per day. If not confirmed, please explain fully.
- e. If subpart a and subpart d are confirmed, please confirm that if the value of Total Trips Daily (Column GH) is calculated incorrectly, then the value for CFM is also calculated incorrectly because inputs to the CFM equation are calculated based upon the Total Trips Daily variable (Column GH). If not confirmed, please explain fully.
- f. If subpart a and subpart d are confirmed, please list all variables which are calculated using the Total Trips Daily variable.
- g. Would the "preferred estimate of volume variability" be based upon a regression after correcting your method for calculating Total Trips Daily? If so, what is this preferred estimate of volume variability?

MPA/USPS-T20-14 Please refer to your response to MPA/USPS-T20-10e, DMA/USPS-T20-2b, LR-H-150, Spreadsheet Data_sum, and LR-H-261, Spreadsheet LR_h261. Please provide an updated Spreadsheet Data_sum and an updated Spreadsheet LR_h261 reflecting all data corrections made since they were filed, including any corrections necessitated by your response to MPA/USPS-T20-13.

MPA/USPS-T12-15 Please refer to your response to MPA/USPS-T20-8b where you confirm that there is an error in the Form 4533 you use as a sample on Workpaper C, Page 5 and your response to MPA/USPS-T20-8c where you state, "As far as I know, the USPS has no general process for checking the quality of data entered in Form 4533."

- a. Has the Postal Service performed any analysis or study of the quality of Form 4533 data? If so, please summarize and provide a copy of all such analyses and studies
- b. Has the Inspection Service or Inspector General performed any analysis or study of the quality of Form 4533 data? If so, please summarize and provide a copy of all such analyses and studies.

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 section 12 of the rules of practice.



James R. Oregan

Washington, D.C.
October 3, 1997