# DOCKET SECTION

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

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POSTAL RATE CHMMISSION OFFICE OF THE SECRETARY Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

## RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MCGRAW-HILL REDIRECTED FROM WITNESS O'HARA (MH/USPS-T30-2a-d)

The United States Postal Service hereby files its responses to the following

interrogatories of McGraw-Hill, filed September 17, 1997: MH/USPS-T30-2a-d.

Each 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

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202)268-2998/FAX: -5402 October 16, 1997

### RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE McGRAW-HILL COMPANIES (REDIRECTED FROM WITNESS O'HARA)

**MH/USPS-T30-2**. With respect to the "intrinsic value" of mail service provided for Periodicals mail, which you describe (p. 29, line 22, through p. 30, lines 1-2) as "moderately high" by comparison with other mail classes:

(a) Please describe fully the data collection program known as "EX2C", including its purpose, methodology, time-frame, and results.

(b) Please explain fully all of the reasons why the EX2C program was terminated.

(c) Please provide as a library reference all reports, summaries, analyses, and aggregations of the data (redacted if necessary to protect the identity of program participants) generated by the EX2C program.

(d) Please identify any and all other information available to the Postal Service (whether or not based upon "nationally representative" data) relating to the extent to which Periodicals (second class) service have or have not been met from January 1994 forward, and provide all documents reflecting such information.

(e) Please state the extent to which, and the reasons why, Periodicals (second-class) mail has been processed with (or after) Standard A (third-class) 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.

### **RESPONSE:**

(a) Periodicals participated on a voluntary basis, subject only to their ability to

meet the requirements of the system. These requirements included ability to

relay time of deposit and location of deposit information accurately and

reliably, ability to de-duplicate their mailing lists to avoid sending duplicate

pieces in the measurement process, ability to seed reporter names into their

own mailing lists, and ability to conform to EX2C addressing requirements.

Each participating mailer selected which of its mailings were to be measured.

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- (b) EX2C was discontinued on November 3, 1996 because it did not provide a nationally representative measure of second-class or Periodicals service performance nor did it provide data that could be used effectively by Postal Service field and headquarters management to improve delivery performance.
- (c) The EX2C program has been discontinued and the attached summary for PQ3, FY 1994 provides the only available information .
- (d) No responsive documents have been identified.
- (e) Answered by witness O'Hara.

EX2C WAS DISMANTLED ON NOVEMBER 3, 1996. NO DATA WAS MAINTAINED OR ARCHIVED FOR EX2C.

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FACT THE THE DATE WERE NOT REPRESENTATIVE OF THE ENTIRE SECOND-CLASS MALL STREAM. NO AGGREGATION OF INFORMATION WAS GENERATED FOR THE PARTICIPANTS OF EX2C AFTER PQ 3, FY 94. THIS WAS DUE TO THE

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PERFORMANCE REPORT

EXTENSIVE SECOND-CIVES HEVENESSEEN

FON DATE: 06/04/94 t efed

#### 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.

Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 October 16, 1997