

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF POSTAL SERVICE WITNESS McCrERY  
TO INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC., AND  
ALLIANCE OF NONPROFIT MAILERS (MPA/USPS-T42-18-19)  
(July 26, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-mentioned interrogatories of Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers, filed on July 12, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**MPA/USPS-T42-18.** Please refer to your response to MPA/USPS-T42-11(b), where you state: “In the absence of bundle breakage, carrier route flats normally are not prepped for piece distribution in the plant. These bundles are dispatched to the appropriate delivery unit where the bundles are distributed to carriers mostly by clerks, and then the bundles are broken open by carriers.” Based on your operational experience, are most of the costs in MODS operation 035 incurred for breaking open bundles and the subsequent activities of removing the packaging material, orienting, and stacking the flats in postal containers and ledges of distribution equipment? If not, please explain fully.

**Response:**

Yes.

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**MPA/USPS-T42-19.** Please refer to your response to MPA/USPS-T42-12. Please confirm that Non-Mixed ADC Periodicals containers that are entered at an Origin BMC are almost always transported from the OBMC to the DBMC (or equivalent facility, such as a destination HASP or PER hub) on their way to the DSCF or DADC. If not confirmed, please explain your response fully.

**Response:**

If the Non-Mixed ADC Periodicals do not destinate within the Origin BMC service area, confirmed. However, I should note that it is my understanding that few Periodicals are entered by customers at Origin BMCs.