

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

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Docket No. R2006-1

RESPONSE OF MPA/ANM WITNESS SANDER GLICK  
TO AMERICAN BUSINESS MEDIA INTERROGATORIES  
ABM/MPA/ANM-T2-1-16  
(September 21, 2006)

The Magazine Publishers of America, Inc. ("MPA") and Alliance of Nonprofit Mailers ("ANM") submit the answers of MPA/ANM witness Sander Glick to American Business Media interrogatories ABM/MPA/ANM-T2-1 through 16. Each question is stated verbatim and then answered.

Respectfully submitted,

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**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-1**

**ABM/MPA/ANM-T2-1.** Please define “very large” as you use the term on page 2, line 10.

**RESPONSE**

I do not have an exact number in mind, but I view a “very large” rate increase as one that is much more than 10 percentage points above the average Periodicals Outside County rate increase.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-2**

**ABM/MPA/ANM-T2-2.** You state at page 2, lines 21 through 24, that the percentage increase faced by Periodicals mailers who engage in what you call “efficient practices” would be larger under the Postal Service’s proposal than the percentage increase faced by those who do not engage in these practices.

(a) Is this statement intended to support the notion that the “incentives” to engage in these practices should be larger than proposed by the Postal Service?

(b) Do you agree that an acceptable definition of “incentive” is “that which incites to action”? If not, please provide your definition.

(c) Please explain whether, and if so why, you believe that the Postal Service should provide rate “incentives” for co-palletizing and/or co-mailing to those who already engage in these practices.

(d) If the Postal Service were to provide “incentives” to those who already co-mail or co-palletize, what forms should those incentives take?

(e) Assume that there is a Periodicals mailer that is now capable of co-mailing or co-palletizing, but does not. Is it true that under the Postal Service’s proposal, the percentage increase for such a mailer would be larger if it chooses to co-palletize or co-mail than if it chooses not to engage in either of these practices?

(f) Assume the existence of two Periodicals mailers, each of which mails a Periodical weighing eight ounces with 50% editorial content and distribution spread throughout the country. Assume further that mailer A now co-palletizes and drop ships, but mailer B mails in origin-entered sacks. (i) Is it your testimony that, as a general rule, the Postal Service’s proposal would impose a higher *percentage* increase on mailer A than on mailer B. (ii) Is it your testimony that, as a general rule, the Postal Service proposal would impose a greater cents-per-copy increase on Mailer A than on Mailer B?

(g) Do you agree that the rate design you support, by increasing the “incentives” to those who now mail in sacks, would also increase the discount to mailers who already mail on drop shipped pallets? If not, why not?

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TO ABM INTERROGATORY ABM/MPA/ANM-T2-2**

**RESPONSE**

(a) Yes.

(b) Your proposed definition—“that which incites to action”—is not exactly what I intended. The following definitions capture more fully the concept I had in mind:

- “something that incites or tends to incite to action or greater effort, as a reward offered for increased productivity.” Dictionary.com. *Dictionary.com Unabridged (v 1.0.1)*, Based on the Random House Unabridged Dictionary, © Random House, Inc. 2006. <http://dictionary.reference.com/search?q=incentive>.
- “a positive motivational influence.” Dictionary.com. *WordNet® 2.0*, Princeton University. <http://dictionary.reference.com/search?q=incentive>.

(c) Yes. Principles of economic efficiency, including the Efficient Component Pricing Rule, indicate that rate incentives for co-mailing and co-palletization should reflect the costs that the Postal Service would avoid from one more unit of co-mailing or co-palletization—i.e., the marginal unit. An individual mailer will respond to these price signals by co-mailing and co-palletizing when the benefits to the mailer (including the rate discounts offered by the Postal Service) from one additional unit of co-mailing or palletization exceed the costs to the mailer. Stated otherwise, the efficient pricing signals are designed to influence mailer behavior for the *marginal* piece of mail.

Not all mail that can be co-mailed or co-palletized is at the margin, of course. For some mail, even deeper discounts for co-mailing and co-palletization will be too small to compensate for the additional costs to the mailer. For other mail—i.e., the mail to which

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TO ABM INTERROGATORY ABM/MPA/ANM-T2-2**

your question alludes—even smaller discounts would suffice to incent the desired worksharing. As noted above, however, economic efficiency focuses on behavior at the margin.

Further, if no rate incentive (i.e., postage discount) were offered to mailers that already co-palletize and co-mail, it is likely that many of these mailers would stop engaging in these practices.

(d) Worksharing discounts. Subject to any tempering thought appropriate to avoid undue rate shock, the Commission should set discounts for co-mailing and co-palletizing equal to the costs that the Postal Service avoids from these activities. See also my response to part (c).

(e) While I cannot say for sure without more information, the percentage increase in postage for this publication assuming that the publication is mailed “solo” is likely to be similar to or lower than the percentage increase in postage that the publication would experience if commingled and dropshipped. To be clear, the percentage increases to which I am referring assume “constant mail mix.” The percentage increase for the solo mailing compares current and proposed postage based upon its characteristics as a solo mailing. The percentage increase if commingled compares current and proposed postage based upon its characteristics as a “commingled” mailing.

(f)(i) I am unsure how you define “a general rule.” But if the only difference

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TO ABM INTERROGATORY ABM/MPA/ANM-T2-2**

between Mailer A and Mailer B is that Mailer A commingles and dropships, Mailer A will often receive a similar or larger percentage increase than Mailer B under the Postal Service proposal.

(f)(ii) No.

(g) Yes. Please also see my responses to parts (c) and (d).

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-3**

**ABM/MPA/ANM-T2-3.** In your opinion, is it easier today for Periodicals to achieve co-palletization or to achieve co-mailing? Why?

**RESPONSE**

Whether co-palletization is easier than co-mailing, or vice versa, depends on the circumstances of a particular publisher. For some publishers, co-palletization is easier. For example, I understand that publications in a co-mail pool currently must have similar trim sizes, and that polywrapped and non-polywrapped publications cannot be co-mailed together. Neither of these restrictions apply to co-palletization. For other publications, these requirements are not important constraints.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-4**

**ABM/MPA/ANM-T2-4.** Do you believe that “most plant managers” would “welcome” mail on 1,500 pound pallets more than mail on 500 pound pallets? Why?

**RESPONSE**

All else being equal, yes. The heavier pallets have lower per-pound pallet handling costs.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-5**

**ABM/MPA/ANM-T2-5.** Do you believe that “most plant managers” would “welcome” flat mail that is contained in an envelope more than flat mail with one bound edge and blow-in cards? Why?

**RESPONSE**

I have not analyzed the relative ease of processing enveloped and non-enveloped flats with blow-in cards, but that sounds possible because plant managers might be concerned that a blow-in card could fall out of the non-enveloped flat and potentially cause processing problems.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-6**

**ABM/MPA/ANM-T2-6.** Please explain in detail why witness McCrery's statement, which you quote at page 5, lines 17-18, that plant managers would "welcome" 5-digit pallets is a relevant ratemaking criterion.

**RESPONSE**

Plant managers are likely to welcome these pallets because flats entered on 5-Digit pallets should cost the Postal Service less to process than other flats. The cost savings are relevant to ratemaking factor 6 -- "the degree of preparation of mail for delivery into the postal system performed by the mailer and its effect upon reducing costs to the Postal Service." I discuss these cost savings on pages 28 through 30 of my testimony, MPA/ANM-T-2.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-7**

**ABM/MPA/ANM-T2-7.** With respect to your proposed shift of a portion of the editorial benefit from the piece to the pound rates, (a) would relatively light or relatively heavy Periodicals benefit, and (b) at what weight “breakpoint” would this shift occur?

**RESPONSE**

The purpose of this shift was not to benefit light or heavy publications, but to limit the increase in the unzoned editorial pound rate. Moreover, this shift would not affect the proportion of revenue that is obtained from the piece or pound side, and thus would not favor either light or heavy Periodicals, on average. The shift, however, would have the incidental effect of benefiting heavier-than-average, high-editorial publications and lighter-than average, low-editorial publications. The average Outside County periodical weighs approximately seven ounces.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-8**

**ABM/MPA/ANM-T2-8.** With respect to Table 2 at page 9, please state: (a) how the seven publications were selected, (b) where and by what printer the seven publications are printed, (c) whether each of the publications is today (i) palletized, (ii) co-palletized, (iii) co-mailed, or (iv) drop shipped, (d) how you calculated the before and after rate increase postage assuming origin entered and co-mailed/drop shipped, and (e) the before and after cents per copy postage assuming origin entry and assuming co-mailed/drop shipped.

**RESPONSE**

(a) We used an ad hoc process to find a combination of publishers and printers that would (1) provide the necessary data in a timely manner; and (2) allow MPA and ANM to use the data.

(b) *Harper's* and *Interweave Knits* are printed by Quad/Graphics in Wisconsin. I understand that the specific plant where they are printed could vary from issue to issue. The other five titles are printed by Quebecor World in St. Cloud, MN, and Lincoln, NE.

(c) All seven publications are currently being co-mailed and dropshipped.

(d) Quad/Graphics and Quebecor World provided me with mail characteristics information for these publications. Based upon these data, I calculated postage under current and proposed rates. My calculations are shown in MPA/ANM-LR-4.

(e) Cents per piece postage can be calculated by dividing postage figures from MPA/ANM-LR-4, which has been filed pursuant to a motion for protective conditions, by the pieces per issue figures in Table 2 of my testimony.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-9**

**ABM/MPA/ANM-T2-9.** With reference to Table 2 at page 9 and the testimony at page 9, lines 11-17, is it your testimony that any of the seven publications that are origin entered today would pay a greater percentage increase under the Postal Service's proposal if they co-mailed and drop shipped than if they did not? If so, please explain and provide the necessary data to support your conclusion.

**RESPONSE**

As mentioned in response to ABM/MPA/ANM-T2-8(c), none of these publications are origin entered today. Table 2 of my testimony compares the percentage rate increases for these publications if comailed and dropshipped with the percentage rate increases if origin-entered as a "solo" mailing.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-10**

**ABM/MPA/ANM-T2-10.** Assume that an electric utility has time-of-day rates to encourage off-peak usage. Assume further that this utility now charges 10 cents per kWh during the on-peak hours and 4 cents per kWh during the off-peak hours. Assume that the utility seeks to increase its rates, such that the on-peak rate would increase by 10% (to 11 cents) and the off-peak rate would increase by 15% (to 4.6 cents).

(a) Please confirm that, in this scenario, the percentage increase for the “behavior” that the utility wishes to encourage will be greater than the percentage increase for the “behavior” that it wishes to discourage.

(b) Please confirm that, in this scenario, the actual cost differential between on-peak and off-peak energy would increase by 6.7% (from 6 cents to 6.4 cents).

(c) Would it be “perverse” (testimony at 2, line 25) or “anomalous” (testimony at 9, line 11) for a utility to increase its rates as stated in the example if its goal is to increase its revenue while maintaining or increasing the incentive for switching from on-peak to off-peak usage? Explain your answer.

(d) If the utility in the example has a customer that, by virtue of the nature of its use, consumes electric energy only at night during the off-peak hours, is it appropriate, or would it be “anomalous,” for the utility or the regulator to provide this customer with an “incentive” to purchase during the off-peak hours? Explain.

**RESPONSE**

(a) Confirmed.

(b) Confirmed.

(c) The answer depends on the circumstances. The scenario appears to achieve the two specified goals. However, assume further that the utility’s cost differential between on-peak and off-peak energy is ten cents per kWh (as compared to the 4-cent rate difference) and that the utility wants to better align its rates with its costs,

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TO ABM INTERROGATORY ABM/MPA/ANM-T2-10**

but constrain the maximum percentage rate increase experienced by its customers. With these additional assumptions, the pricing proposal hypothesized in your question would be anomalous and perverse. The utility could better align rates with costs while still constraining the rate increase for all users to 15%.

(d) Charging a lower-cost user a lower rate is appropriate. Absent some practical and lawful way to price-discriminate between those ratepayers who would engage in a particular form of cost-saving behavior regardless of price, and those who would do so only with a rate differential that recognizes the resulting cost savings to the supplier, economic efficiency indicates that the supplier should offer the relevant rate incentives to all of its customers. Further, as a matter of fairness, it seems appropriate to offer a lower price to a lower-cost user.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-11**

**ABM/MPA/ANM-T2-11.** Please explain why “a way to analyze whether a rate design proposal encourages” a certain type of mail preparation is “to compare the postage incentive for performing these activities under the proposed set of rates with the incentive provided by the current rates,” (testimony at 9, lines 12-15), rather than to compare the postage savings resulting from performing those activities with the cost of performing them?

**RESPONSE**

Principles of economic efficiency, including the Efficient Component Pricing Rule, indicate that the rate differentials should reflect the *Postal Service's* cost savings from the mailer behavior, not the costs of each mailer (which neither the Postal Service nor the Commission are in a position to know). Individual mailers will then compare the resulting rate schedule with their own costs, and respond to the Postal Service's price signals by engaging in co-mailing, co-palletizing and other optional behavior when, but only when, the incremental costs of this behavior are smaller than the rate incentives. Price signals that reflect the supplier's cost savings thus will encourage efficient behavior by its customers without requiring the supplier to know the customers' costs.

One fact is clear, however: a larger discount for performing an activity provides more encouragement to do it. For example, a publisher for which the cost of performing one more unit of an activity is more than three cents, but less than four cents, will perform the activity if a four-cent discount is offered but not if the discount is only three cents.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-12**

**ABM/MPA/ANM-T2-12.** Please confirm that comparing “the postage incentive for performing these activities under the proposed set of rates with the incentive provided by the current rates” (testimony at 9, lines 12-15) provides only a way to compare the level of incentive in the current rates with the level of incentive in the proposed rates, not whether incentive is adequate. If you cannot confirm, please explain.

**RESPONSE**

Confirmed. To know whether an incentive is adequate to change a particular mailer’s behavior, one must know that mailer’s costs. To know whether an incentive is adequate to satisfy the Efficient Component Pricing Rule, however, one need only know whether the incentive recognizes the full cost savings to the Postal Service from the mailer activity.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-13**

**ABM/MPA/ANM-T2-13.** Assume that the Postal Service wished to provide an incentive to Periodical mailers to use DDU entry between 11:00 PM and midnight and, under current rates, offered a 1/10<sup>th</sup> of a cent per piece rate incentive for doing so.

(a) If the Postal Service proposed to increase the incentive to 2/10ths of a cent per piece, please explain how this increase in incentive permits analysis of whether the rate design actually encourages the entry sought.

(b) Please analyze whether the doubling of the incentive would encourage DDU entry between 11:00 PM and midnight if you assume further that the cost to the mailer of such entry is 5 cents per piece.

(c) Please confirm that an analysis of the efficacy of a discount to encourage entry of mail at a DDU between 11:00 PM and midnight requires information concerning the cost to the mailer of entering mail in this manner.

**RESPONSE**

(a) Increasing the incentive from 0.1 cents to 0.2 cents per piece will result in more DDU entry during the specified hour if there are some mailers with some mail for which the cost of DDU entry at this time is greater than 0.1 cent per piece but less than 0.2 cent per piece. I do not know whether this is so for the particular form of mailer behavior specified in your hypothetical question.

(b) If the marginal cost of entering one more piece of mail at the DDU between 11:00 and midnight is 5 cents per piece, raising the discount from 0.1 cents to 0.2 cents is unlikely to generate more volume, unless DDU entry during this hour provides the mailer with some other marginal benefits worth at least 4.8 cent per piece.

(c) Not confirmed. Another way to determine the efficacy of a discount is to

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offer it and measure the actual response. If the resulting volume is greater than zero, we can infer that the discount plus the other benefits to the mailer from DDU entry at the specified hour exceed the marginal costs to the mailer.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-14**

**ABM/MPA/ANM-T2-14.** With reference to Table 4 at page 11, where you provide selected data with respect to Periodicals analyzed by USPS witness Tang in Docket No. C2004-1, please provide the percentage increases resulting from the MPA/ANM rate proposal for each of the publications analyzed by witness Tang.

**RESPONSE**

The following table shows the percentage increases, assuming no change in mail preparation or other mailer behavior. As MPA/ANM witness Cohen discusses in her testimony, however, mailers have options for mitigating these impacts, and our rate proposal will increase the incentives for mailers to use those options. Finally, note that since USPS-LR-L-173 does not provide data on the number of pieces on 5-digit pallets, I assumed that there are no pieces on 5-digit pallets in preparing the table.

<b>Num</b>	<b>ID</b>	<b>% Increase</b>
1	L1	16.3%
2	L10	7.9%
3	L11	10.5%
4	L2	15.4%
5	L3	12.2%
6	L4	10.9%
7	L5	11.7%
8	L6	10.1%
9	L7	7.1%
10	L8	9.1%
11	L9	9.7%
12	M1	19.6%
13	M10	9.7%
14	M11	15.5%
15	M12	14.1%
16	M13	14.9%
17	M14	13.1%
18	M15	13.0%
19	M16	14.0%
20	M17	11.1%
21	M18	9.7%
22	M19	8.8%

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23	M2	20.7%
24	M20	8.8%
25	M3	13.6%
26	M5	13.4%
27	M6	11.2%
28	M7	10.1%
29	M8	10.1%
30	M9	9.9%
31	P1HL12	7.8%
32	P1HL13	4.9%
33	P1HL14	6.9%
34	P1HL15	8.7%
35	P1HL16	8.2%
36	P1HL17	9.5%
37	P1HL18	11.7%
38	P1HL19	10.3%
39	P1HL20	9.6%
40	P1HL21	10.8%
41	P1HL22	1.2%
42	P1HL23	7.4%
43	P1HL24	10.3%
44	P1HL25	7.6%
45	P1HL26	18.5%
46	P1HL27	8.5%
47	P1HL28	9.9%
48	P1HL29	9.7%
49	P1HL30	9.9%
50	P1HL31	13.8%
51	P1HL32	10.8%
52	P1HL33	16.6%
53	P1HL34	12.3%
54	P1HL35	9.7%
55	P1HL36	8.5%
56	P1HL37	12.5%
57	P1HL38	9.5%
58	P1HL39	8.2%
59	P1HL40	9.7%
60	P1HL41	11.4%
61	P1HL42	11.2%
62	P1HL43	12.7%
63	P1HL44	9.9%
64	P1HL45	10.9%
65	P1HL46	12.8%
66	P1HL47	8.2%
67	P1HL48	10.4%
68	P1HL49	17.9%
69	P1HL50	9.8%
70	P1HL51	13.1%
71	P1HM100	10.9%

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-14**

72	P1HM61	8.7%
73	P1HM62	19.4%
74	P1HM63	13.6%
75	P1HM64	14.4%
76	P1HM65	22.4%
77	P1HM66	18.6%
78	P1HM67	15.1%
79	P1HM68	16.0%
80	P1HM69	19.2%
81	P1HM70	11.4%
82	P1HM71	13.3%
83	P1HM72	17.4%
84	P1HM73	9.5%
85	P1HM74	10.9%
86	P1HM75	15.6%
87	P1HM76	10.6%
88	P1HM77	12.4%
89	P1HM78	18.9%
90	P1HM79	13.6%
91	P1HM80	15.4%
92	P1HM81	16.8%
93	P1HM82	8.4%
94	P1HM83	11.5%
95	P1HM84	17.1%
96	P1HM85	19.0%
97	P1HM86	12.1%
98	P1HM87	16.1%
99	P1HM88	8.7%
100	P1HM89	18.0%
101	P1HM90	16.9%
102	P1HM91	15.6%
103	P1HM92	9.4%
104	P1HM93	11.0%
105	P1HM94	12.4%
106	P1HM95	9.7%
107	P1HM96	16.6%
108	P1HM97	10.3%
109	P1HM98	14.4%
110	P1HM99	13.2%
111	P1LM21	13.3%
112	P1LM22	17.4%
113	P1LM23	14.7%
114	P1LM24	21.2%
115	P1LM25	13.1%
116	P1LM26	17.7%
117	P1LM27	18.4%
118	P1LM28	16.0%
119	P1LM29	21.2%
120	P1LM30	12.6%

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-14**

121	P1LM31	19.7%
122	P1LM32	20.3%
123	P1LM33	15.3%
124	P1LM34	14.9%
125	P1LM35	17.0%
126	P1LM36	13.6%
127	P1LM37	18.7%
128	P1LM38	21.2%
129	P1LM39	13.4%
130	P1LM40	18.3%
131	P1LM41	19.8%
132	P1LM42	10.6%
133	P1LM43	17.4%
134	P1LM44	9.3%
135	P1LM45	10.3%
136	P1LM46	18.8%
137	P1LM47	15.3%
138	P1LM48	19.6%
139	P1LM49	18.5%
140	P1LM50	17.0%
141	P1LM51	18.6%
142	P1LM52	17.0%
143	P1LM53	17.0%
144	P1LM54	21.2%
145	P1LM55	16.2%
146	P1LM56	20.3%
147	P1LM57	18.0%
148	P1LM58	21.2%
149	P1LM59	18.0%
150	P1LM60	21.2%
151	M4	17.5%
152	S1	19.5%
153	S10	22.2%
154	S11	14.7%
155	S12	18.6%
156	S13	15.4%
157	S14	13.1%
158	S15	20.7%
159	S16	18.4%
160	S17	20.7%
161	S18	21.3%
162	S19	18.5%
163	S2	20.0%
164	S20	7.1%
165	S21	18.8%
166	S22	21.3%
167	S23	16.0%
168	S24	10.3%
169	S3	14.2%

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-14**

170	S4	20.7%
171	S5	15.7%
172	S6	18.2%
173	S7	21.8%
174	S8	19.8%
175	S9	14.5%
176	QHS25	14.0%
177	QHS26	14.5%
178	QHS27	20.4%
179	QHS28	15.9%
180	QHS29	17.5%
181	QHS30	13.0%
182	QHS31	19.8%
183	QHS32	17.1%
184	QHS33	17.4%
185	QHS34	20.3%
186	QHS35	12.0%
187	QHS36	19.5%
188	QHS37	9.8%
189	QHS38	18.4%
190	QHS39	18.6%
191	QHS40	20.2%
192	QHS41	15.5%
193	QHS42	18.6%
194	QHS43	15.6%
195	QHS44	18.8%
196	QHS45	15.4%
197	QHS46	15.4%
198	QHS47	20.0%
199	QHS48	19.9%
200	QHS49	13.8%
201	QHS50	20.2%
202	QHS51	15.2%
203	QHS52	15.4%
204	QHS53	20.6%
205	QHS54	19.1%
206	QHS55	22.1%
207	QHS56	20.3%
208	QHS57	20.5%
209	QHS58	17.5%
210	QHS59	12.3%
211	QHS60	14.5%
212	QHS61	15.1%
213	QHS62	16.9%
214	QHS63	16.5%
215	QHS64	14.6%
216	QHS65	19.2%
217	QHS66	20.6%
218	QHS67	19.9%

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-14**

219	QHS68	14.2%
220	QHS69	18.2%
221	QHS70	14.1%
222	QHS71	13.6%
223	QHS72	14.9%
224	QHS73	21.4%
225	QHS74	19.2%
226	QHS75	19.4%
227	QHS76	13.8%
228	QHS77	20.1%
229	QHS78	18.8%
230	QHS79	19.1%
231	QHS80	19.6%
232	QHS81	15.0%
233	QHS82	14.1%
234	QHS83	20.8%
235	QHS84	18.2%
236	QHS85	13.5%
237	QHS86	14.6%
238	QHS87	14.2%
239	QHS88	17.5%
240	QHS89	13.9%
241	QHS90	18.1%
242	QHS91	14.4%
243	QHS92	14.0%
244	QHS93	15.0%
245	QHS94	18.1%
246	QHS95	15.5%
247	QHS96	19.3%
248	QHS97	19.3%
249	QHS98	14.2%
250	QHS99	19.6%
251	QHS100	13.9%

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-15**

**ABM/MPA/ANM-T2-15.** Please define “small” as you use that word on page 12, line 21.

**RESPONSE**

I was generally referring to publications defined in Tang’s dataset (USPS-LR-L-173) as small, i.e., those with less than 15,000 Outside County pieces per issue.

**RESPONSE OF MPA/ANM WITNESS GLICK  
TO ABM INTERROGATORY ABM/MPA/ANM-T2-16**

**ABM/MPA/ANM-T2-16.** With reference to the 45.11 pieces per sack that you use to develop per-piece container cost differences (testimony at 27, lines 17-20), does that figure reflect any increase in the number of pieces per sack that would result from the Postal Service's rate proposal in this docket?

**RESPONSE**

No. However, 45.11 pieces per sack is the higher of the two available estimates. USPS witness Tang's response to MPA/USPS-T35-16 (7 Tr. 1703) explains the sources of the 45.11 pieces per sack and 41.64 pieces per sack cited on page 27 of my testimony.