

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE AMERICAN BUSINESS PRESS WITNESS MCGARVY
(USPS/ABP-T2-1-4)

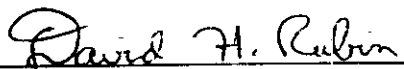
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the American Business Press witness McGarvy: USPS/ABP-T2-1-4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
January 23, 1998

USPS/ABP-T2-1. Please refer to your testimony on page 4, lines 6 to 8. Please confirm that “on time” delivery in these instances would be within one business day. If you do not confirm, please explain why not.

USPS/ABP-T2-2. Please refer to your testimony at page 5, lines 2 to 13, and the attachment to your testimony.

- (a) Please explain the data collection procedures used by Red Tag to obtain the data provided in the attachment to your testimony.
- (b) How were the 65 publications selected for monitoring?
- (c) How is “On Time” defined?
- (d) Please define “Monitors Reports” in the heading in the attachment.
- (e) Please provide the annual circulation for each of the 65 publications.
- (f) Are the cities listed in the attachment the entry point or destination for the publications? Please explain.
- (g) Please provide any additional data relating the zone of the mailing to the data provided in the attachment.
- (h) Please provide any additional data relating the type of the periodical (e.g., newspaper, tabloid, regular magazine) to the data provided in the attachment.

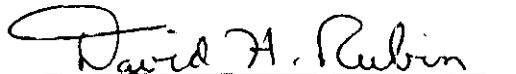
USPS/ABP-T2-3. Please provide the complete results of the ABP member survey mentioned in your testimony at page 7, lines 7 to 10.

USPS/ABP-T2-4. Please refer to your testimony on page 9, lines 5 to 12.

- (a) Please confirm that the rates for the 'Carrier Route', 'High Density' and 'Saturation' presort levels are non-automated per piece rates. (See DMM § R200.1.2.) If you do not confirm, please explain why not.
- (b) Please confirm that the 'reclassification aftermath' you refer to (line 11) included a 14.3 percent reduction (from 13.9 cents to 11.9 cents) in the Carrier Route rate, a 16.5 percent reduction (from 13.3 cents to 11.1 cents) in the High Density rate, and a 22.1 percent reduction (from 12.2 cents to 9.5 cents) in the Saturation rate. If you do not confirm, please explain why not.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

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