

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

RATE ADJUSTMENT DUE TO)
EXTRAORDINARY OR EXCEPTIONAL)
CIRCUMSTANCES)

Docket No. R2013-11

**MOTION OF
MPA—THE ASSOCIATION OF MAGAZINE MEDIA,
THE AMERICAN CATALOG MAILERS ASSOCIATION, INC.,
ASSOCIATION FOR POSTAL COMMERCE,
DIRECT MARKETING ASSOCIATION, INC.,
ALLIANCE OF NONPROFIT MAILERS,
ASSOCIATION OF MARKETING SERVICE PROVIDERS,
NATIONAL NEWSPAPER ASSOCIATION,
PRINTING INDUSTRIES OF AMERICA,
QUAD/GRAPHICS, INC., R.R. DONNELLEY,
AND TIME INC.
FOR ISSUANCE OF SECOND INFORMATION REQUEST
(October 18, 2013)**

Pursuant to 39 C.F.R. § 3001.21(a), the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. See 39 C.F.R. § 3007.3(c); Docket No. RM2008-4, Order No. 203 (April 16th, 2009) at 55 (recognizing the appropriateness of having the Commission retain the discretion to propound information requests proposed by third parties in dockets where the schedule is too tight to allow traditional discovery by intervenors).

Question 18 asks the Postal Service to correct what appears to be an inadvertent computational error in a spreadsheet that the Postal Service submitted as a library reference in support of its case. Question 19 requests that the Postal Service review

and potentially correct what appears to be a data discrepancy between spreadsheets submitted in two different library references. USPS responses to these questions should provide a cleaner record for further analysis.

18. This question refers to the FY 2012 Standard Mail “Non-Flat Machineables & Parcels” contribution per piece figures in Library Reference USPS-R2010-4R/11, R2010.4R.11.Contribution.Calculation.xlsx and the FY 2012 Annual Compliance Determination. Please provide a revised version of USPS-R2010-4R/11, R2010.4R.11.Contribution.Calculation.xlsx that includes the correct FY 2012 per-piece contribution figure for “Non-Flat Machineables & Parcels” from the FY 2012 Annual Compliance Determination

19. This question refers to Library Reference USPS-R2010-4R/9, RCFDATA.xlsx, “Public” and USPS-R2010-4R/10, ExigentImpact.xlsx, “Volume,” cells S83:S93 (which contain FY 2002 through FY 2012 volumes for First-Class International Letters, Cards, & Flats). For FY 2009 – 2012, the annual First-Class International Letters, Cards, & Flats in ExigentImpact.xlsx can be calculated by summing the values for the corresponding year in column Y of “Public” in RCFDATA.xlsx. For FY 2002 – 2008, this is not so. For example, in FY 2008, the sum of cells Y154:Y157 in the worksheet “Public” in RCFDATA.xlsx is 375.693; the value in cell S89 of “Volume” in ExigentImpact.xlsx for FY 2008 is 406.248.

- a. Please identify the cells in RCFDATA.xlsx to sum to generate each of the values in S83 to S89 of the “Volume” tab of ExigentImpact.xlsx.
- b. Please identify the cells from RCFDATA.xlsx to sum to generate First-Class International Letters, Cards, and Flats volume (based upon the same definition of this product as in the “Volume” tab of ExigentImpact.xlsx) for each year from FY 1970 to FY 2001.
- c. Please provide First-Class International Letters, Cards & Flats volumes (based upon the same definition of this product as in the “Volume” tab of ExigentImpact.xlsx) for each year from FY 1970 to FY 2001.
- d. If either of the referenced spreadsheets is in error, please provide corrected versions.

CONCLUSION

Wherefore, the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion.

Respectfully submitted,

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