

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
TO USPS WITNESS McCRERY
(MPA/USPS-T42-1-2)
(May 25, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., directs the following interrogatories to United States Postal Service witness Marc D. McCrery (USPS-T-42).

If the witness cannot answer a question or subpart, we request that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

David M. Levy
Paul A. Kemnitzer
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005-1401
(202) 736-8000

*Counsel for Magazine Publishers of America,
Inc.*

MPA/USPS-T42-1. Please refer to lines one through three on page 20 of your testimony, where you state, “Very few delivery units have an FSM, so the vast majority of the incoming secondary processing at the delivery units is manual. Very little manual incoming secondary distribution takes place at plants.” Please also refer to lines four through six on page 21 of your testimony where you state, “In FY 2005, 59 percent of flat mail incoming secondary (non carrier-route presort) volume was processed in the plants, and 93 percent of this volume was finalized on automated operations.”

- (a) In FY 2005, what percentage of non-carrier-route presort flats received manual incoming secondary sorts? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results.
- (b) In FY 2005, what percentage of Periodicals Outside County non-carrier-route presort flats received manual incoming secondary sorts? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results. If no data specific to the Periodicals Outside County subclass are available, please provide your best estimate and explain the rationale for your estimate.
- (c) What was the Postal Service’s total piggybacked FY 2005 Periodicals Outside County manual incoming secondary flat sorting cost? Please explain your calculation and produce, or provide citations to, underlying documents sufficient to replicate your results.

MPA/USPS-T42-2. Please refer to your testimony at page 20, line 29, through page 21, line 2. There you state, “Also, any automation compatible Periodicals volume currently processed in a manual incoming secondary operation will be moved to an automated processing operation to the greatest extent possible when the processing window exists.”

- (a) In the Test Year, what percentage of Periodicals Outside County incoming secondary flat sorts do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results.

- (b) In the Test Year, what percentage of incoming secondary sorts for Periodicals Outside County flats that qualify for automation rates do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results..
- (c) In the Test Year, what percentage of incoming secondary sorts for Periodicals Outside County non-carrier-route flats that do not qualify for automation rates do you expect to be manual? Please explain your response fully and produce, or provide citations to, underlying documents sufficient to replicate your results.