

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FOURTH SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS McCRERY
(MPA/USPS-T42-13-16)
(June 19, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the following interrogatories to United States Postal Service witness Marc 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., and Alliance of Nonprofit Mailers*

MPA/USPS-T42-13.

(a) Please list and explain the current address hygiene requirements to qualify for (i) Periodicals Outside County nonautomation, non-carrier route rates; (ii) Periodicals Outside County automation rates; and (iii) Periodicals Outside County carrier route rates.

(b) Do you believe that failing to meet the address hygiene requirements to qualify for Periodicals Outside County automation rates and carrier route rates is a major reason why a portion of periodicals are entered at nonautomation, non-carrier route rates. If not, please explain fully.

(c) If a Periodicals Outside County flat does not meet the address hygiene requirements to qualify for automation rates, is it also likely that the flat would not meet the address hygiene requirements to qualify for carrier route rates? If not, please explain fully.

(d) Is the importance of address quality likely to increase in the future flats sequencing environment? Please explain fully.

MPA/USPS-T42-14. Please refer to your descriptions of the UFSM 1000, AFSM 100, and Flats Recognition Improvement Program (FRIP) on pages 14 through 16 of your testimony.

(a) In today's operating environment in which USPS flat sorters are equipped with both OCRs and BCRs, do you believe, based upon your operational experience, that a large portion of the worksharing cost avoidance for automation flats derives from the address hygiene requirements to qualify for automation rates? Please explain your response fully.

(b) In the Test Year operating environment, do you believe, based upon your operational experience, that a large portion of the worksharing cost avoidance for automation flats will derive from the address hygiene requirements to qualify for automation rates? Please explain your response fully.

MPA/USPS-T420-15. Please discuss all changes in address hygiene requirements for Periodicals Outside County mail that are expected to occur by FY 2008.

MPA/USPS-T42-16. This question refers to witness Tang's response to MPA/USPS-T35-1(a), where she confirms that "mailers may be allowed to enter Periodicals and Standard Mail in the same containers in the Test Year." Please

provide the Postal Service's best estimate of when it will begin allowing mailers to enter Periodicals and Standard Mail in the same containers.