

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,  
2006

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Docket No. R2006-1

SIXTH SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.,  
AND ALLIANCE OF NONPROFIT MAILERS  
TO USPS WITNESS McCRERY  
(MPA/USPS-T42-18-19)  
(July 12, 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,

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**MPA/USPS-T42-18.** Please refer to your response to MPA/USPS-T42-11(b), where you state: “In the absence of bundle breakage, carrier route flats normally are not prepped for piece distribution in the plant. These bundles are dispatched to the appropriate delivery unit where the bundles are distributed to carriers mostly by clerks, and then the bundles are broken open by carriers.” Based on your operational experience, are most of the costs in MODS operation 035 incurred for breaking open bundles and the subsequent activities of removing the packaging material, orienting, and stacking the flats in postal containers and ledges of distribution equipment? If not, please explain fully.

**MPA/USPS-T42-19.** Please refer to your response to MPA/USPS-T42-12. Please confirm that Non-Mixed ADC Periodicals containers that are entered at an Origin BMC are almost always transported from the OBMC to the DBMC (or equivalent facility, such as a destination HASP or PER hub) on their way to the DSCF or DADC. If not confirmed, please explain your response fully.