

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

ELEVENTH SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS TANG
(MPA/USPS-T35-27-28)
(August 7, 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 Rachel Tang (USPS-T-35). 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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QUESTIONS

MPA/USPS-T35-27. This is a follow-up to your response to MPA/USPS-T35-22 and to USPS-LR-L-126, REV 7-13-2006 LR 126 Outside County Revised.xls, worksheet "Pound Data_Adv."

(a) Please confirm that USPS-LR-L-126 allocates 1.2 cents per pound in distance-related transportation costs to DADC-entered mail. If not confirmed, please explain fully.

(b) Please confirm that USPS-LR-L-126 allocates no distance related transportation costs to DSCF-entered mail. If not confirmed, please explain fully.

(c) Please confirm that USPS-LR-L-126 develops a 0.3-cent per pound DADC dropship discount (based upon a 50% passthrough of the DADC nontransportation cost avoidance). If not confirmed, please explain fully.

(d) Please confirm that USPS-LR-L-126 develops a 1.5-cent per pound DSCF dropship discount (based upon a 50% passthrough of the DSCF nontransportation cost avoidance). If not confirmed, please explain fully.

(e) Please confirm that, based upon your response to the above subparts, the advertising pound rate difference between DADC and DSCF entry should be 2.4 cents (1.2 cents + 1.5 cents - 0.3 cents). If not confirmed, please explain fully.

(f) Please confirm that USPS-LR-L-126 calculates a 2.1-cent advertising pound rate difference between DADC and DSCF entry. If not confirmed, please explain fully.

(g) Taking into account your response to the above subparts, please explain why the 2.1-cent advertising pound rate difference between DSCF and DADC entry calculated in USPS-LR-L-126 is accurate.

MPA/USPS-T35-28. This is a follow-up to your response to MPA/USPS-T35-17. Please refer to the spreadsheet provided in response to MPA/USPS-T35-17(i).

(a) Please confirm that, in the "After" scenario, the spreadsheet shows that the 12 publications will use a total of 1178 containers to mail 250,204 pieces, which translates into approximately 212 pieces per container. If not confirmed, please provide the correct figures.

(b) Please confirm that the average pieces per container for co-palletized publications will generally be significantly higher than 212. If not confirmed, please explain fully.

(c) Please explain (i) the source of your data on the number of containers for the “after” scenario; (ii) whether the source takes into account the effect of the May 11 rule requiring 24 pieces in most sacks; and (iii) any other reasons why the source may overstate the number of containers for the twelve publications in the “after” scenario.