

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

EXPERIMENTAL PERIODICALS
CO-PALLETIZATION DROPSHIP DISCOUNTS FOR
HIGH EDITORIAL PUBLICATIONS, 2004

Docket No. MC2004-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ALTAF H. TAUFIQUE TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION (APWU/USPS-T1-1-3)

The United States Postal Service hereby files the responses of witness Altaf H.

Taufique to the following interrogatories of the American Postal Workers Union:

APWU/USPS-T1-1-3, filed on March 30, 2004.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

/s/ _____
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April 8, 2004

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APWU/USPS-T1-1. Current policy requires uniform pound rates for the editorial content of periodicals. Is this proposal designed to change that rate design? If so, please explain the rationale for proposing such a change. If not, please explain why it does not reflect such a change.

RESPONSE:

This proposal is not designed to change any element of the existing rate design for Periodicals. This proposal has a limited objective of introducing additional discounts to encourage mailers to co-palletize their mail and drop their mail closer to its destination at a destination ADC or SCF.

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APWU/USPS-T1-2. How will it be determined if a periodical qualifies for the discount and will there be any leeway allowed? A) Will qualification be based on the weight and editorial content for each mailing or will it be based on some average over time? B) If it is based on an average, what time period will be used? C) If some leeway is allowed, what will be the parameters of such leeway?

RESPONSE:

My testimony discusses in detail the eligibility criteria for the publications to qualify.

Please see USPS-T-1 at 7-12.

A) Please see my response to interrogatory TW/USPS-T1-5.

B) Not Applicable.

C) Not Applicable.

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APWU/USPS-T1-3. Could periodicals co-palletized under this experiment qualify for any other worksharing discounts in addition to the ones proposed here? If so please indicate which discounts would be available to them.

RESPONSE:

Yes. The publications that co-palletize and dropship using the proposed discounts would be eligible for the appropriate palletization and dropship discounts available on the current rate chart except for the current per-piece co-palletization discounts. Please see USPS-T-1 at 8, line 16, to page 9, line 1.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

/s/

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