

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

THIRD SET OF INTERROGATORIES OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO UNITED STATES POSTAL SERVICE
(MPA/USPS-4)
(July 18, 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 the United States Postal Service.

Respectfully submitted,

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MPA/USPS-4. This is a follow-up to the Postal Service’s institutional response to MPA-USPS-2. The response states in relevant part:

However, the methodology used to develop MPA-T-25-2b overstates the number of average facilities 5-Digit containers pass through. These estimates were developed under the assumption that all 5-Digit sacks would be opened and the contents distributed at the DDU. If 5-Digit sacks contain mail for zones where the Incoming Secondary sort is performed at the DSCF they may be opened and the contents distributed at the DSCF rather than at the DDU as is assumed implying one less facility passed through.

(a) Please confirm that MPA-2_attach.xls produces an upper-bound estimate of the number of facilities containers pass through. If not confirmed, please explain fully.

(b) Please confirm that reducing by one the number of facilities that 5-Digit sacks pass through in MPA-2_attach.xls produces a lower-bound estimate of the number of facilities 5-Digit sacks pass through. If not confirmed, please explain fully.

(c) Please confirm that DDU-entered containers pass through zero facilities on their way to the destination facility. If not confirmed, please explain fully.

(d) Please confirm that the following table is correct. If not confirmed, please explain fully and provide the correct figures.

**Average Number of Facilities Periodicals Outside County
Containers Pass Through**

Container Type	Upper Bound	Lower Bound
Sack	2.38	2.17
Pallet	0.85	0.85
Total	2.29	2.10

Upper Bound – Calculated using the same method as used to generate MPA-2_attach.xls.

Lower Bound – Calculated using the same method as used in MPA-2_attach.xls, but reduces by one the number of facilities 5-Digit sacks pass through.

Note: Both calculations assume that DDU-entered containers pass through zero facilities.