

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYES TO  
INTERROGATORY OF THE MAGAZINE PUBLISHERS OF AMERICA, INC.  
(MPA/USPS-T25-3)

The United States Postal Service hereby files the response of Witness Mayes to the above-listed interrogatory of the Magazine Publishers of America, Inc., filed on July 12, 2006.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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July 26, 2006

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MAYES TO  
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.

**MPA/USPS-T25-3.** Please refer to your response to MPA/USPS-T25-2(a), where you state: “The DSCF cost avoidance is calculated assuming that DSCF entry avoids one BMC equivalent handling and 0.194 SCF equivalent handlings.” Please also refer to Table 1 of the response to MPA/USPS-T28-1, which shows the number of containers by container type, container presort level, and entry facility type. Is 1.194 the difference in the average number of container handlings between Periodicals entered at the DSCF and the same containers if entered at the DBMC (as the term “DBMC” is used in Table 1 of the response to MPA/USPS-T28-1)? If not, please provide your best estimate of the difference in the average number of container handlings between Periodicals entered at the DSCF and the same containers if entered at the DBMC, based on assumptions consistent with those used to estimate the Periodicals nontransportation destination entry cost avoidance in USPS-LR-L-88.

**RESPONSE:**

The 1.194 represents the number of facilities avoided relative to an average non-destination dropshipped Zone 1 & 2 mailing. Relative to the non-dropshipped Zone 1&2 mailing, the DSCF mailing avoids a transfer hub handling and 20% of the time the mailing would avoid a DADC handling. This 20% is adjusted for the assumption that 3.14% of the mailings go straight from the transfer hub to the DDU, avoiding the DADC altogether. But, if “DBMC” is substituted for “transfer hub”, the same number of facilities would be avoided by DSCF relative to DBMC.

## 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.

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Nan K. McKenzie

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