

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

RECEIVED
Nov 30 4 20 PM '01

POSTAL RATE AND FEE CHANGES, 2001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYES
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T23—1-2)**

The United States Postal Service hereby provides the response of witness Mayes to the following interrogatories of Newspaper Association of America: NAA/USPS-T23—1-2, filed on November 16, 2001.

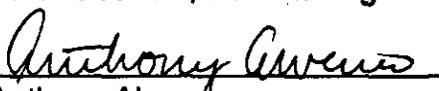
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
November 30, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MAYES TO INTERROGATORIES OF
NEWSPAPER ASSOCIATION OF AMERICA (NAA)

NAA/USPS-T23-1. Please refer to your testimony at Page 2, lines 9-12 and Appendix B, Table 2, or LR-J-68.

- a. Please confirm that the cost data that you provide to witnesses Moeller and Hope is [sic] expressed in cost per pounds [sic].
- b. Please confirm that the cost data that you provide to witnesses Moeller and Hope are not expressed in cost per piece.
- c. If you cannot confirm (b) or (c), please explain why not.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Not applicable.

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MAYES TO INTERROGATORIES OF
NEWSPAPER ASSOCIATION OF AMERICA (NAA)

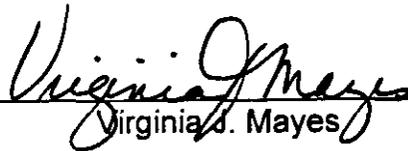
NAA/USPS-T23-2. Please refer to your testimony at Page 4, lines 9-12. Please confirm that the non-transportation cost savings associated with destination entry of Standard Mail are costs of handling mail in bulk (cross-docking) and not costs related to piece handlings. If you cannot confirm, please explain why not.

RESPONSE:

Confirmed.

DECLARATION

I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

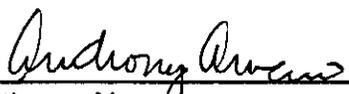


Virginia J. Mayes

Dated: 11-30-01

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.



Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
November 30, 2001