

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20068-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

THIRD SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER  
ASSOCIATION TO POSTAL SERVICE WITNESS CZIGLER, USPS-T-1  
(NNA/USPS-T1-27-34)  
July 12, 2006

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service Martin Czigler and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

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July 12, 2006

**NNA/USPS-T1-27** In NNA/USPS-T1-13, you were asked to “please explain fully how it was determined that exactly 174 Periodicals tallies required manual checks while 7,497 Periodicals tallies did not require manual checks.” In your response you indicated that “The subclass of the 174 tallies could not be resolved automatically by the programs described in USPS-LR-L-9, Appendix D.” With respect to each of the 174 Periodicals tallies that required manual checks please state why each tally required a manual check and whether each tally was ultimately classified by the USPS as a Within County Periodical, an Outside County Periodical or not a Periodical at all.

**NNA/USPS-T1-28** In your response to NNA/USPS-T1-14, you state that “Ten tallies did not initially receive the additional checking described in LR-L-9, Appendix D. With respect to each of these tallies, please explain fully why each tally initially was considered not to require manual checking and why this assessment changed so that manual tallies were ultimately required. Please indicate whether each of these ten tallies was ultimately classified by the USPS as a Within County Periodical, an Outside County Periodical or not a Periodical at all.

**NNA/USPS-T1-29** In the file labeled “summ2005.rpt” in USPS-LR-L-156, you indicate that in the “Original Distribution,” there were 387 Within County tallies. Please explain fully how each of these 387 “original” Within County tallies can be identified in the PC SAS data file for IOCS Base Year 2005 (prcsas.sas7bdat) that was previously provided in USPS-LR-L-9. If these “original” tallies cannot be identified in the PC SAS data already provided, please furnish a comparable but revised PC SAS data file for IOCS Base Year 2005 data in which these 387 Within County tallies can be identified.

**NNA/USPS-T1-30** In the file labeled “tally\_changes.05” in USPS-LR-L-156, you list instances where the activity code for “request.pubs” tallies was changed from 2211 to 2212. With respect to these changes, please provide a step-by-step review of the procedures used by the USPS to identify such publications and to confirm that all such publications in the tally sample were identified.

**NNA/USPS-T1-31** In your response to NNA/USPS-T1-16, you indicate that the “original” tally count of 387 reflects the number of tallies identified as potential Within County Periodicals following the process described in LR-L-9, Appendix B, Part 2, section 6.8. Please refer to Table 1 in your response to NNA/USPS-T1-20. Are the tally counts listed under the heading “Number of tallies” in that response calculated at the same step in processing (Appendix B, Part 2, section 6.8) as the “original” tally count of 387. If not, please provide a breakdown of both the 387 “original tallies” and the total number of tallies by IOCS question (as shown in Table 1) as those counts appeared at the same “original” process step.

**NNA/USPS-T1-32** In your response to NNA/USPS-T1-18, you indicate that “Westmoreland News was inadvertently included among the inconsistent tallies. Later processing with a more complete data base eventually enabled this tally to be verified automatically.” With respect to this response, please explain fully what you mean by “a more complete data base” and provide the earlier, less complete data base in PC SAS format.

**NNA/USPS-T1-33** In your response to NNA/USPS-T1-20, you list Periodicals responses by IOCS question. With respect to Table 1 in this response, please confirm, that Q23G01 and Q23G01A would only have been asked if the answer to Q23E06 was not Y. Explain fully any answer other than a confirmation.

**NNA/USPS-T1-34** In your response to NNA/USPS-T1-20, under the column heading “Number non Periodicals” in Table 1, please confirm that these values reflect tallies which had initially been identified as Periodicals in responses to Q23E06, Q23G01 or Q23G01A but which were subsequently identified as non-Periodicals. Please explain fully any answer other than a confirmation.