

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

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POSTAL RATE COMMISSION
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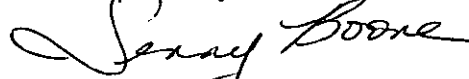
Postal Rate and Fee Changes

Docket No. R2000-1

First Set of Interrogatories of
National Newspaper Association
to USPS Witness Hunter
(NNA/USPS T5 -1-11)

Pursuant to Section 20 of the Commission's Rules of Practice, the National Newspaper Association (NNA), hereby submits the attached interrogatories to USPS Witness Hunter (NNA/USPS T5-1-11).

Respectfully Submitted



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February 16 2000

QUESTIONS

Please respond in detail to the questions submitted. If you cannot answer a question because it is beyond your area of expertise, please refer it to another USPS witness who can respond.

NNA/USPS T5 - 1. Please confirm that the total annual volumes for in-county mail are derived in part from a panel of post offices using the PERMIT system and in part from a supplemental stratified sample of non-automated post offices.

NNA/USPS T5 - 2. Please provide a breakdown of in-county volumes in the base year used in this docket by Cost Ascertainment Group according to the source of the data: PERMIT based, non-automated office sample or other sources. Please explain any other source used.

NNA/USPS T5 - 3. Please provide the same data requested in Interrogatory 2 for the test year used in this docket.

NNA/USPS T5 - 4. Please provide annual total volumes for in county mail by fiscal year for a period from 1986 to 1998.

NNA/USPS T5 - 5. Please explain in detail any changes in sampling, sampling design, billing determinant measurement, computerization of post offices or measurement methodology instituted by the Postal Service that would have changed the ways these volumes were determined during this time period.

NNA/USPS T5 - 6. Please confirm that the sampling design for volumes calculated from nonautomated offices has not changed since 1986. If your answer is negative, please explain your response in detail.

NNA/USPS T5 - 7. Please state the frequency with which the panel of sampled offices in non-automated offices is refreshed.

NNA/USPS T5 - 8. Please refer to page 39 in the testimony by USPS Witness Thress, lines 22 to 24. Are you familiar with the changes in sampling framework to which this witness refers? If so, please explain it the changes in detail and discuss how the changes affected the piece volume count for within county mail.

NNA/USPS T5 - 9. Please refer to page 40 in the testimony by USPS Witness Thress, lines 4 through 7. Do you agree with his statement that a smaller volume series for this subclass is also inherently more volatile?

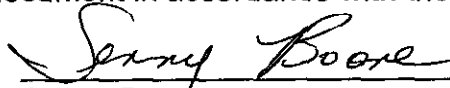
NNA/USPS T5 – 10. Please state whether the volatility of this series has increased or decreased since 1986 and explain your response.

NNA/USPS T5 - 11. Please answer the following questions with respect to a nonautomated office submitting data for the volume and revenue samples:

- a. Are the data recorded in the PERMIT system by any individual outside that nonautomated office?
- b. If your response is no, please explain how the data are recorded.
- c. Does the office submit hard-copy mailing statements for recording?
- d. Does the office submit a year's worth of statements? If your answer is no, please state the span of time involved.
- e. Besides volume and revenue data, what other information is recorded from these statements?

Certificate of Service

I hereby certify that I have on this 16 day of February, 2000, served the foregoing document in accordance with the Commission's Rules of Practice.



Senny Boone