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

RECEIVED

FEB 16 | 22 PH 'NN

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

Second Set of Interrogatories of National Newspaper Association to USPS Witness Hunter (NNA/USPS T5 - 12 - 25)

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 T5-12-25).

Respectfully Submitted

Senny Boope, VP & Genera

Counsel

National Newspaper Association

1010 N. Glebe Road Arlington, VA 22201 Sboone@nna.org

Tonda F. Rush KING & BALLOW PO Box 50301 Arlington VA 22205 (703) 241-1480 (703) 534-5751(fax) NewsBizLaw@aol.com

Counsel for the National Newspaper Association

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 - 12. Please confirm that BRPW captures PERMIT-based office data by use of a sample of PERMIT-based post offices, rather than a total census of mailing statements from PERMIT offices. If your answer is negative, please explain the statements on p. 3 of your testimony, lines 4-5.

NNA/USPS T5 – 13. Please provide the sampling framework for the PERMIT offices.

- a. When was this sampling system first designed?
- b When was it last updated?
- c. How frequently is it updated?

NNA/USPS T5 - 14. Please answer the question with respect to volumes entered through additional entry offices.

- a. Are volumes recorded in PERMIT through the original entry office or the additional entry office, or neither or both?
- b. Is it possible for a mailing to escape PERMIT entry completely, either because of noncompliance with guidance given to post offices in use of PERMIT or through other human error?

c. If your answer to b is no, please explain what mechanism or procedure in PERMIT avoids such error.

NNA/USPS T5 - 15. Please answer the question with respect to volumes entered for authorized exceptional dispatch.

- a. Are volumes recorded in PERMIT through the original entry office or the exceptional dispatch office, or neither or both?
- b. Is it possible for an exceptional dispatch mailing to escape PERMIT entry completely, either because of noncompliance with guidance given to post offices in use of PERMIT or through other human error?
- c. If your answer to b is no, please explain what mechanism or procedure in PERMIT avoids such error.

NNA/USPS T5 - 16. Please answer the question with respect to nonautomated offices whose volume and revenue data are gathered through a sampling system where additional entry is involved.

- a. Are volumes collected on mailing statements through the inclusion of the original entry office or the additional entry office, or neither or both?b. Is it possible for a mailing to escape sampling completely, either because of noncompliance with guidance given to post offices or through other human error?
- c. If your answer to b is no, please explain what mechanism or procedure in the sampling system avoids such error.

NNA/USPS T5 - 17. Please answer the question with respect to nonautomated offices whose volume and revenue data are gathered through a sampling system where exceptional dispatch is involved.

- a. Are volumes collected on mailing statements through the inclusion of the original entry office or the exceptional dispatch office, or neither or both?
- b. Is it possible for a mailing to escape sampling completely, either because of noncompliance with guidance given to post offices or through other human error?
- c. If your answer to b is no, please explain what mechanism or procedure in the sampling system avoids such error.

NNA/USPS T5 - 18. If volumes entered in an entry office were authorized for exceptional dispatch, please explain how under both PERMIT and the nonautomated sample how the BPRW would determine whether these volumes were eligible for the in-county rate.

NNA/USPS T5 - 19. If a post office that formerly appeared in the nonautomated sample migrates to the PERMIT system, is it replaced in the nonautomated sample by another post office?

NNA/USPS T5 – 20. Please refer to LR I-44, the Periodicals System User Guide Section 1.1, pg. 6-7.

- a Please explain why no rate code appears for In-county mail.
- b. Please explain the function of the rate code.
- c. Please explain how the absence of a rate code for in-county mail affects calculation of revenues, pieces or weights of in-county mail, if it does.

NNA/USPS T5 - 21. Please confirm that a newspaper eligible for in county rates is also eligible for in county rates at an exceptional dispatch office if it is also within the county. If you cannot respond to this question, please refer it to a witness capable of making this admission.

NNA/USPS T5 - 22. Please confirm that exceptional dispatch set up permits

Postal Service to track how many copies the mailer intends to enter. If your
answer is yes, please provide an estimate of the volumes of in-county mail
entered for delivery through exceptional dispatch? If you cannot, please explain
in detail why the data are not available.

NNA/USPS T5 - 23. Please refer to LR I-44, the Periodicals System User Guide, Section 1.14. Explain what "marked copies" was intended for and why unavailable.

NNA/USPS T5 - 24. Please examine p. 4 of LR I-44, the Periodical System User Guide, referring to entry of form 3510 reentry/additional entry data. Please confirm that it is possible for a periodical entered at an additional entry point to pay postage at an office of original entry, through a centralized postage payment or another means. If your answer is no, please explain the notation on the screen: "Is it paid in other offices?" If your answer is yes, please list the options or refer this question to a witness who is able to answer it.

NNA/USPS T5 - 25. Please confirm that sections 1.2 and 1.3 in LR I-44 direct the entry post office to set up screens listing additional entry offices as well as exceptional dispatch offices as appropriate for the periodical's intended distribution. If the steps required for additional entry differ from exceptional dispatch in any manner other than the setting up of a postage account and the collection of an entry fee, please explain them.

Certificate of Service

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

Senny Bolone