

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
SHARON DANIEL (NAA/USPS-T28-1-8)  
March 1, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Sharon Daniel (NAA/USPS-T28-1-8) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

March 1, 2000

William B. Baker  
William B. Baker

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**NAA/USPS-T28-1: Please refer to page 5, lines 10-11 of your testimony.**

**Please explain fully how using the CRA methodology is “superior to allocating costs where weight is not known totally on the basis of weight or piece volumes alone.”**

**NAA/USPS-T28-2: Please refer to Library Reference USPS-I-99, textual summary, at page 2. Please indicate whether, when “no weight” tallies are redistributed over all tallies with weight, such redistribution is weighted on a proportional basis by tallies with weight?**

**NAA/USPS-T28-3: Please refer to Library Reference USPS-I-100, textual summary, at page 1-2.**

- a. Please explain why data are collected by half-ounce weight increments up to four ounces, but only by full ounce increments between four and 16 ounces.**
- b. Did you make any specific use in your testimony of the half-ounce increments between one and four ounces. If so, please explain where. If not, please explain why not.**

**NAA/USPS-T28-4: With reference to the “ECRWSS” marking on Enhanced Carrier Route walk-sequenced saturation mail:**

- a. When did the Postal Service first allow the “ECRWSS” marking to be used?**
- b. What other markings has the Postal Service allowed, and for what time periods, for ECR walk-sequenced saturation mail since September 1, 1997?**

**NAA/USPS-T28-5: Please refer to page 8, lines 17-18, of your testimony, where you state that access time costs “should not vary significantly by weight and are**

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therefore distributed on the basis of pieces.” Please explain the basis for this statement, and identify any cost study or analysis upon which you rely as support for this statement.

NAA/USPS-T28-6: Please refer to Library Reference USPS-I-92, Section 1, Page 1 of 30, Table 3.

- a. Please confirm that Table 3 presents estimated test year unit costs for flats weighing less than 3.0 oz. of \$0.2494 and for flats weighing less than 3.5 oz. of \$0.2289. If you cannot confirm, please explain why not.
- b. Why does the inclusion of flats weighing between 3 and 3.5 ounces reduce the estimated unit cost compared to flats weighing up to 3 ounces?

NAA/USPS-T28-5: Please refer to page 8, lines 27-28, of your testimony, at which you state, in connection with attributing elemental load costs: “if weight is used as a distribution key, costs will double as weight doubles. This is not necessarily the case for load time.”

- a. Please provide your basis for stating that it “is not necessarily the case” that elemental load costs double as weight doubles.”
- b. Is it possible that elemental load costs do double as weight doubles? If your answer is negative, please explain why not.

NAA/USPS-T28-6: Please refer to page 16, Figure 3, of your testimony. Please state whether Table 3 refers to all commercial Standard (A) mail, or merely the Standard (A) Regular subclass.

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~~NAA/USPS~~-T28-7: Please refer to page 17, Table 3, of your testimony.

- a. Please confirm that Table 3 indicates that Standard (A) ECR letters weighing less than 3 ounces have higher estimated test year unit costs than the corresponding letters in the nonprofit ECR subclass. If you cannot confirm, please explain why not.
- b. Please confirm that Table 3 indicates that Standard (A) ECR letters weighing less than 3.5 ounces have higher estimated test year unit costs than the corresponding letters in the nonprofit ECR subclass. If you cannot confirm, please explain why not.
- c. Please confirm that Table 3 indicates that Standard (A) ECR flats weighing less than 3 ounces have lower estimated test year unit costs than the corresponding flats in the nonprofit ECR subclass. If you cannot confirm, please explain why not.
- d. Please confirm that Table 3 indicates that Standard (A) ECR letters weighing less than 3.5 ounces have lower estimated test year unit costs than the corresponding flats in the nonprofit ECR subclass. If you cannot confirm, please explain why not.
- e. Please identify every reason why the commercial ECR letters have higher estimated test year unit costs than the nonprofit ECR letters, but commercial ECR flats have lower estimated test year unit costs than the corresponding nonprofit ECR flats.

NAA/USPS-T28-8: Please refer to page 17, Table 3, of your testimony.

- a. Please confirm that Table 3 indicates that Standard (A) ECR letters weighing **less than 3 ounces** have **higher** estimated test year unit costs than Standard (A) ECR flats in the same weight range. If you cannot confirm, please explain why not.
- b. Please confirm that Table 3 indicates that Standard (A) nonprofit ECR letters weighing less than 3.0 ounces have **lower** estimated test year unit costs than Standard (A) nonprofit ECR flats in the same weight range. If you cannot confirm, please explain why not.
- c. Please confirm that Table 3 indicates that Standard (A) ECR letters weighing less than 3.5 ounces have **higher** estimated test year unit costs than

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**Standard (A)** ECR flats in the same weight range. If you cannot confirm, please explain why not.

- d. Please confirm that Table 3 indicates that Standard (A) nonprofit ECR letters weighing less than 3.5 ounces have **lower** estimated test year unit costs than Standard (A) nonprofit ECR flats in the same weight range. If you cannot confirm, please explain why not..
- e. Please identify every reason why the commercial ECR letters in (a) and (c) have **higher** estimated test year unit costs than the corresponding flats, while the nonprofit ECR letters in the same weight ranges have **lower** estimated test year unit costs than the corresponding nonprofit ECR flats.