

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS HUNTER TO INTERROGATORIES OF
THE NATIONAL NEWSPAPER ASSOCIATION
(NNA/USPS-T5-26-30)
(March 8, 2000)

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of the National Newspaper Association: NNA/USPS-T5-26-30, filed on February 23, 2000.

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

K N Hollies
Kenneth N. Hollies

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.

K N Hollies
Kenneth N. Hollies

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March 8, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER
TO INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T5-26. Please answer the following questions with respect to verification referred to in LR I-44. If you cannot respond, please refer the question to another witness who is able to respond.

- a. Please explain what verification is required.
- b. Confirm that [P]eriodicals mail is verified by weighing, post office audit or audit bureau audit.
- c. Confirm that PERMIT records the fact that verification was conducted, if it was.
- d. Confirm that if no verification occurred, PERMIT would indicate its absence. If your answer is no, please explain.

RESPONSE. This response is based on my understanding of discussions with other postal officials.

- a-b. The reference is to a presort verification, which is not related to circulation or other audits.
- c. Confirmed.
- d. A record of bypassed presort verifications is kept at the local level.

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NNA/USPS-T5-27. In the instance of additional entry, please explain whether verification is accomplished by the entry post office or the additional entry office, both or neither.

RESPONSE. See the response to NNA/USPS-T5-26. The presort verification is performed at the office where the mail is presented for entry.

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NNA/USPS-T5-28. In the instance of exceptional dispatch, please explain whether verification is accomplished by the entry post office, the exceptional dispatch office, both or neither.

RESPONSE. See the responses to NNA/USPS-T5-26 and 27.

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NNA/USPS-T5-29. Does the PERMIT [S]ystem contain data that would enable the Postal Service to analyze the frequency of publication of users of [I]n-[C]ounty mail entered in PERMIT-based offices? If your answer is yes, please provide a breakdown of publication frequency for the base year in this case. If your answer is no, please explain in detail why the data are not available.

RESPONSE. See the response to NNA/USPS-T5-26. The frequency of publication is not readily determined since this type of information is not centrally recorded or stored and is outside the design specifications of the BRPW and PERMIT System. This information is also irrelevant to the PERMIT System and non-automated office data streams which do not and need not record it in order to report volumes for the BRPW. The construction of the BRPW estimates from the VIP Code level aggregates reported by panel offices is discussed in my testimony, and in USPS-LR-I-25 and USPS-LR-I-26.

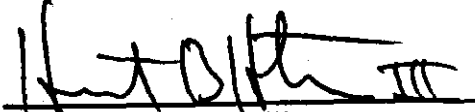
**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER
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NNA/USPS-T5-30. Does the non-automated [office] sampling system for [l]n[-C]ounty mail contain data that would enable the Postal Service to analyze the frequency of publication of users of [l]n[-C]ounty mail entered in non[-]automated offices? If your answer is yes, please provide a breakdown of publication frequency for the base year in this case. If your answer is no, please explain in detail why the data are not available.

RESPONSE. I understand that data which would allow Postal Service headquarters to conduct such an analysis are not available. It might be possible for respective Districts to do this if they invest appropriate time and programming resources. See also the response to NNA/USPS-T5-29.

DECLARATION

I, Herbert B. Hunter III, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Herbert B. Hunter III

Date: March 8, 2000