

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

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Postal Rate and Fee Changes, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION
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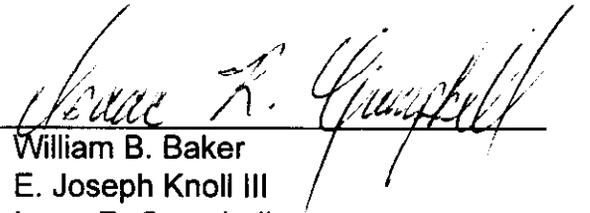
**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
PETER BERNSTEIN (NAA/USPS-T41-1-3)
March 14, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Peter Bernstein (NAA/USPS-T41-1-3) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:

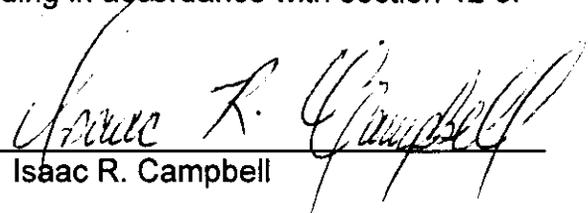

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CERTIFICATE OF SERVICE

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 14, 2000


Isaac R. Campbell

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
PETER BERNSTEIN (NAA/USPS-T41-1-3)

NAA/USPS-T41-1: Please refer to your testimony. For each of the following tables, please cite the particular library reference spreadsheet or document which contains the backup for each of the numbers in the tables. If such backup is not currently available, please provide it.

- a. Summary Table 1, page 10.
- b. Summary Table 2, page 11.
- c. Summary Table 3, page 13.
- d. Table 9, page 67.
- e. Table 10, page 69.
- f. Table 12, page 73.

NAA/USPS-T41-2: Please refer to Library Reference USPS-LR-I-156,

"Computer Program Relating to the Testimony of Witness Bernstein, USPS-T-41".

- a. Please confirm that the file called atb.wk1 is the output of the program atb.m.
- b. Please confirm that the file called ramout1.wk1 is the output of the program Rprice1.m.
- c. Please confirm that the file called call1.wk1 is an input for the program prep1.m.
- d. Please provide the output file to the program prep1.m.

NAA/USPS-T41-3: Please refer to Library Reference USPS-LR-I-156,

"Computer Program Relating to the Testimony of Witness Bernstein, USPS-T-41".

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
PETER BERNSTEIN (NAA/USPS-T41-1-3)

Please refer to the file called "r00data.wk4". Please cite the particular library reference spreadsheet or document which contains the backup for each of the numbers on worksheet "BR Data" including the following:

- a. Column B, Before-rates volumes.
- b. Column D, Before-rates FWI postage.
- c. Column E, User cost.
- d. Column G, Before-rates IC.
- e. Column H, Before-rates WC.
- f. Column N, After rates volume.
- g. Column O, After-rates FWI price.
- h. Column Q, After-rates WC.
- i. Column S, PRC Attributable (BR).
- j. Column V, R97-1 PRC Markup.
- k. Column Y, Ramsey Price.
- l. Column Z, Ramsey Volume.
- m. Column AA, PRC Price.
- n. Column AB, PRC Volume.