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

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Postal Rate and Fee Changes, 2000

POSTAL RATE COMMISSION Docket No. R2000-10F THE SECRETARY

# NEWSPAPER ASSOCIATION OF AMERICA SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS <u>THOMAS E. THRESS (NAA/USPS-T7-13)</u> March 21, 2000

The Newspaper Association of America hereby submits the attached interrogatory to United States Postal Service witness Thomas E. Thress (NAA/USPS-T7-13) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Bv:

William B. Baker E. Joseph Knoll III Isaac R. Campbell WILEY, REIN & FIELDING 1776 K Street, N.W. Washington, DC 20006-2304 (202) 719-7255

### **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.

m B. Baky

March 21, 2000

Robert J. Brinkmann

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NEWSPAPER ASSOCIATION OF AMERICA

William B. Baker

## NEWSPAPER ASSOCIATION OF AMERICA SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS THOMAS E. THRESS (NAA/USPS-T7-13)

#### NAA/USPS-T7-13: Please refer to LR-I-122.

- a. Please identify the version of Soritec statistical software which you used to run these programs.
- b. Note that the file "deqn.sac" contains the note "if soritec ever gets its memory problems fixed, this program could conclude with a series of execute commands." However, the file "deqn.sac" does conclude with a series of execute commands. Please detail what was intended by the note.
- c. Please confirm that simply running the file deqn.sac from within Soritec does not generate the results in your testimony, and in fact, hangs the computer system due to Soritec memory problems.
- d. If you cannot confirm this, please describe the computer environment which you are running that allows you to successfully run "deqn.sac".
- e. If you can confirm that simply running "deqn.sac" does not generate the results in your testimony and in fact hangs the computer system, please give the sequence of running programs and modifying programs which generate the results in your testimony without hanging the computer system.
- f. "Deqn.sac" refers to an output file called "out\_r2000.LST". Please provide "out\_r2000.LST."