

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  
DONALD M. BARON (NAA/USPS-T12-1-7)  
March 22, 2000**


The Newspaper Association of America hereby submits the attached interrogatory to United States Postal Service witness Donald M. Baron (NAA/USPS-T12-1-7) 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 22, 2000

  
William B. Baker

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DONALD M. BARON (NAA/USPS-T12-1-7)

NAA/USPS-T12-1: Please refer to your testimony at page 33, footnote 43 and your response to MPA/USPS-T12-18, referring to the A.T. Kearney Data Quality Study (April 16, 1999).

- a. Please explain specifically how the Engineered Resign data you received from Witness Raymond serve to update the "relatively old and highly imprecise carrier special studies" cited by the Data Quality Study.
- b. Please describe your understanding of whether collection of the ES data was appropriately designed and compiled, and whether the study serves as an acceptable substitution for the street time and street activity analyses previously relied upon for ratemaking purposes.
- c. Please identify your knowledge of any similarities between the ES study and the route measurement systems or engineering time studies of other postal administrations or courier companies used to design and attribute their delivery costs, as suggested by the Data Quality Study.
- d. Please provide your assessment of the appropriateness of the use of the ES data in the current R2000-1 docket, given the Data Quality Study's suggestions that such a project is a "potential alternative source of data" and "will take several years to fully develop," including any and all quality and validation steps you or others performed to merit its use.

NAA/USPS-T12-2. Please refer to your response to Interrogatory MPA/USPS-T12-6 (b), that listed the number of city routes by area and delivery mode for PQ4 FY97. Please provide the same information for FY86. If FY86 is not available, please provide the information for the earliest time period that is.

NAA/USPS-T12-3. Please refer to your response to Interrogatory MPA/USPS-T12-6 (c) that listed the number of city routes by area and route type as defined in

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ES.CNTL for PQ4 FY97. Please provide the same information for FY86. If FY86 is not available, please provide the information for the earliest time period that is.

NAA/USPS-T12-4. Please refer to your response to Interrogatory MPA/USPS-T12-20 that listed the average possible deliveries per route by delivery type category (residential curb, residential NDCBU, etc.) for the 166,107 routes in the PQ4 FY97 CRMF data base. Please provide the same information for FY86. If FY86 is not available, please provide the information for the time period closest to FY86 that is available.

NAA/USPS-T12-5. Please refer to your response to Interrogatory MPA/USPS-T12-25, that listed the average number of deliveries by type (residential curb, residential NDCBU, etc.) and route type. Please provide the same information for FY86. If FY86 is not available, please provide the information for the earliest time period that is.

NAA/USPS-T12-6. Please confirm that, for ZIP 98011, Route 32, the city carrier data set that you provided in response to MPA/USPS-T12-26 (LR-I-219) lists 334 Curb, 195 Centralized, 26 NDCBU, and 73 Other possible deliveries.

- a. Please refer to your response to MPA/USPS-T12-30 and confirm that the route type reported on the ES database was Residential Curb, and explain the basis for this.
- b. Please refer to your response to MPA/USPS-T12-26 and confirm that the route type you utilized was Residential Loop, and explain the basis for this.

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
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NAA/USPS-T12-7. Please confirm that for ZIP 30087, Route 59, the city carrier data set that you provided in response to MPA/USPS-T12-26 (LR-I-219) lists 357 NDCBU, 266 Centralized, 138 Curb, and 4 Other possible deliveries for this same route.

- a. Please refer to your response to MPA/USPS-T12-30 and confirm that the route type reported on the ES database was Residential Loop, and explain the basis for this.
- b. Please refer to your response to MPA/USPS-T12-26 and confirm that the route type you utilized was Residential Loop, and explain the basis for this.