

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

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Postal Rate and Fee Changes, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
NANCY R. KAY (NAA/USPS-T23-1-5)
March 22, 2000**


The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Nancy R. Kay (NAA/USPS-T23-1-5) 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

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
NANCY R. KAY (NAA/USPS-T23-1-5)

NAA/USPS-T23-1: Please list the Postal Service cost pools that you consider to be "Type 4" cost pools?

NAA/USPS-T23-2. Please list the Postal Service cost pools that you consider to be "Type 6" cost pools?

NAA/USPS-T23-3. Please list the Postal Service cost pools that you consider to be "Type 8" cost pools?

NAA/USPS-T22-4. Please refer to Table 1A of your testimony.

- a. Please confirm that line 22 (Standard (A) ECR) and line 23 (Standard (A) Regular) do not sum to line 24 (total commercial), except for columns 3 and 5. If you do not confirm, please explain why not.
- b. Is the reason lines 22 and lines 23 do not sum to line 24 because the combination of the Standard (A) Regular and Standard (A) Enhanced Carrier Route commercial subclasses produces "incremental costs" beyond those created by these two subclasses together?

NAA/USPS-T23-5. Please refer to page 15, lines 24-26 of your testimony, where you note that Standard (A) mail (among others) has no product specific costs.

- a. Does this passage refer to Base Year or Test Year?
- b. Does the absence of any product specific costs mean that there is no product-specific advertising for Standard (A) mail? Please explain your answer.