

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

RECEIVED

MAR 22 3 15 PM '00

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
MICHAEL D. BRADLEY (NAA/USPS-T22-1-4)
March 22, 2000**


The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Michael D. Bradley (NAA/USPS-T22-1-4) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By:


William B. Baker
E. Joseph Knoll
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.

March 22, 2000


William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MICHAEL D. BRADLEY (NAA/USPS-T22-1-4)

NAA/USPS-T22-1. Please refer to page 15, lines 23-25, of your testimony, where you state that "Attributable costs incorporate only the cost of the last unit produced, whereas incremental costs incorporate the costs of all of the units produced."

- a. Please confirm that the quoted statement assumes that "attributable costs" are defined as marginal costs (or volume variable costs).
- b. Please confirm that the Postal Rate Commission has not, in past cases, defined "attributable costs" as marginal costs (or volume variable costs) in all cost segments.

NAA/USPS-T22-2. Does the term "intrinsic cost" as defined in your testimony at page 20 include product specific costs that do not vary by volume (so long as at least one unit is produced)? If not, please explain.

NAA/USPS-T22-3. Are the access costs incurred by a city carrier in accessing a single subclass stop an example of an intrinsic cost? If not, how would you classify single subclass access costs.

NAA/USPS-T22-4. Please identify the ways in which your definition of incremental costs differs from the Postal Rate Commission's definition of "attributable costs."