

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
OFFICE OF THE SECRETARY

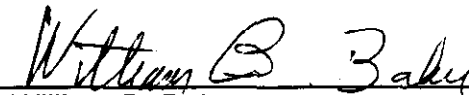
**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
CHARLES L. CRUM (NAA/USPS-T27-1-5)
March 23, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Charles L. Crum (NAA/USPS-T27-1-5) 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 23, 2000


William B. Baker

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INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
CHARLES L. CRUM (NAA/USPS-T27-1-5)

NAA/USPS-T27-1: Please refer to your testimony at page 4, lines 16-19.

- a. Please confirm that you suggest that volume could serve as an appropriate proxy in determining non-transportation savings.
- b. Please confirm that Witness Daniel converts your cost per pound estimates by destination type into cost per piece. If you used volume as a proxy, instead of weight, would your calculated costs per piece correspond with Witness Daniel's? Please explain your answer.

NAA/USPS-T27-2: Please refer to your testimony at page 6, lines 13-16.

- a. Please confirm that these estimates are neither rate category- nor shape-specific.
- b. Please explain whether rate category and shape influence dropshipped proportions, and justify your response.
- c. If rate category and shape influence drop proportions, please justify the appropriateness of using non-specific cost per pound estimates.

NAA/USPS-T27-3: Please explain how you would calculate total TY non-transportation costs based on your estimated TY costs per pound by destination type.

NAA/USPS-T27-4: Please refer to your testimony at Attachment C, Table 4.
Please justify your assumption that the TY/BY ratio for pieces equals the TY/BY ratio for weight.

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CHARLES L. CRUM (NAA/USPS-T27-1-5)

NAA/USPS-T27-5: Please refer to your testimony at Attachment B, Table 1 and Attachment C, Table 9. Please explain the apparent discrepancy in recorded total TY pounds between the worksheets.