

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

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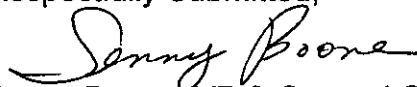
Postal Rate and Fee Changes

Docket No. R2000-1

**Second Set of Interrogatories of  
National Newspaper Association  
to the United States Postal Service  
(NNA/USPS-15)**

Pursuant to Section 20 of the Commission's Rules of Practice, the National Newspaper Association (NNA), hereby submits the attached interrogatory to the United States Postal Service (NNA/USPS-15).

Respectfully Submitted,



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April 21, 2000

## QUESTIONS

Please refer the following questions to a witness with the expertise to respond to them and who will be available to explain the responses in oral cross-examination.

**NNA/USPS-15.** Please refer to the response to NNA/USPS-4 (a), which states that “[t]he PERMIT System was first deployed around 1985.” Please further refer to Witness Thress’s testimony USPS-T-7 at page 40, lines 18-19, which states: “The Periodical nonprofit equation is estimated using a starting period of 1978Q1. In contrast, the other three Periodical equations all use a starting period of 1971Q1.” Please further refer to Witness Tolley’s testimony USPS-T-6 at page 19, lines 13-14, which states: “The companion testimony of Thomas Thress (USPS-T-7) provides a detailed explanation of the econometric analysis of mail volumes.” Finally, please refer to Witness Tolley’s testimony at page 90, Table 7A, which provides the volume forecasts for in-county mail.

- a. Please confirm that the Postal Service’s volume forecasts for the test year are based in part on econometric regressions using volume data going back to FY1971.
- b. Please describe the procedure that was used to estimate in-county volume from FY1971 until FY1985.
- c. Please describe any adjustments made in mail volume estimates to adjust for undercounting of within county mail, as referred to in Dr. Tolley’s testimony.

d. Please state the most recent fiscal year for which the in-county volume estimates used no information from the PERMIT system.

e. Please provide the in-county volume estimate for the year stated in (c).

**Certificate of Service**

I hereby certify that I have on this 21<sup>st</sup> day of April, 2000, served the foregoing document in accordance with the Commission's Rules of Practice.

*Alexis Baden-Mayer*  
Alexis Baden-Mayer