

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
MAGAZINE PUBLISHERS OF AMERICA, INC. *ET AL.* WITNESS
ANTOINETTE CROWDER (NAA/MPA-T5-1-8)
June 19, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to Magazine Publishers of America, Inc. *et al.* witness Antoinette Crowder (NAA/MPA-T5-1-8) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:



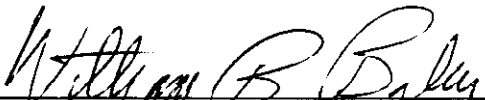
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Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

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.

June 19, 2000



William B. Baker

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NAA/MPA-T5-1. Please refer to your testimony at page 14, lines 19-21, where you state “[t]his confusion over ‘point of delivery’ is evident in tallies Mr. Raymond assigned to load that show the carrier’s activity as walking or traveling between deliveries while supposedly at the ‘point of delivery.’”

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

NAA/MPA-T5-2. Please refer to your testimony at page 14, footnote 9, where you state “[a]nother example are point of delivery tallies for dismount deliveries with an LLV (vehicle) activity code, which he assigned to load.”

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

NAA/MPA-T5-3. Please refer to your testimony at page 15, lines 7-8, where you state that “he assigned a number of ‘on route’ tallies to load.”

- a. Please state the total number of such allegedly misassigned tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

NAA/MPA-T5-4. Please refer to your testimony at page 15, lines 8-9, where you state that “[l]ikewise, the location of the ‘vehicle’ overlaps with other locations, such as ‘point of delivery,’ on curblines deliveries.”

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- a. Please state the total number of such allegedly overlapping tallies.
- b. Please provide, in electronic format, these tallies identified by route and individual scan.

NAA/MPA-T5-5. Please refer to your testimony at page 16, lines 4-7, where you state that "for load operations which occur quickly (e.g., only a few seconds), data collectors probably had difficulty discerning whether a 'beep' that occurred around that time actually coincided with the quick load, or shortly before or after that load, which should have been access time." Please provide the basis for this assertion.

NAA/MPA-T5-6. Please refer to your testimony at page 18, lines 13-15, where you state "[i]n some cases, however, he admitted that he needed to reference the data collector comments log or the USPS Form 3999X. But, in most cases, I suspect even referring back to those items cannot be sufficient." Please provide the basis for this assertion.

NAA/MPA-T5-7. Please refer to your testimony at page 23, lines 20-21, continued through page 24, lines 1-2, where you state "[i]n short, independent review and validation of a study requires an assessment of both the excluded data and the reasons for their exclusion. This has not been possible due to the extreme lateness of the disclosure of these problems and the inadequacy of Raymond's explanations." Please explain why Mr. Raymond's explanations are inadequate.

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NAA/MPA-T5-8. Please refer to your testimony at page 28, lines 16-17, where you state "I do not believe the ES sample of 340 routes with an unweighted sampling ratio of 0.2% of total Postal Service routes is adequate to fully represent the above conditions . . ." Please provide a sampling ratio, or range of sampling ratios, that you believe would be adequate.

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