

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
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Postal Rate and Fee Changes, 2000)
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_____) Docket No. R2000-1

NATIONAL NEWSPAPER ASSOCIATION
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS (NNA/USPS ST-44-1-2)
July 31, 2000

Pursuant to Sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the National Newspaper Association hereby submits interrogatories and requests for production of documents. These interrogatories are submitted for the purpose of possible development of rebuttal testimony. The Postal Service is requested to refer these questions for institutional response if the witness cannot answer them.

Respectfully submitted,



Tonda F. Rush
Counsel to
National Newspaper Association

King & Ballow
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Arlington, VA 22205
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July 31, 2000

NNA/USPS-ST44-1. Please refer to the attachment to this interrogatory, titled In-County Mail Processing (CS 3.1) Cost Changes 1986-1999. The attachment charts reported costs, pieces and unit in Cost Segment 3.1 (Mail Processing - Clerks and Mailhandlers) for the Within County Subclass.

Please confirm that the data in this attachment are correct. If they are not correct, please provide corrected data.

NNA/USPS ST44-2 Please provide the 95 percent confidence intervals for Cost Segment 3.1 (Mail Processing - Clerks and Mailhandlers) for the Within-County subclass for:

- (i) Base Year costs for R97-1 (1996);
- (ii) Base Year costs for R2000-1 (1998); and
- (iii) 1999 costs calculated using the R2000-1 costing methodology.

In-County Mail Processing (CS 3.1) Cost Changes 1986-1999

Year/Method	3.1 Cost (000s)	Pieces (000s)	3.1 Unit Cost
USPS 1986	\$18,714	1,737,956	\$0.011
USPS 1987	\$19,879	1,479,531	\$0.013
USPS 1988	\$21,697	1,488,271	\$0.015
USPS 1989	\$22,918	1,458,827	\$0.016
USPS 1990	\$27,296	1,382,914	\$0.020
USPS 1991	\$24,916	1,179,504	\$0.021
USPS 1992	\$25,189	1,192,671	\$0.021
USPS 1993	\$23,560	1,057,671	\$0.022
USPS 1994	\$14,223	1,006,421	\$0.014
USPS 1995	\$13,464	907,187	\$0.015
USPS 1996	\$12,643	877,829	\$0.014
1996 R97 Base Year	\$15,210	877,829	\$0.017
USPS 1997	\$20,470	947,047	\$0.022
USPS 1998	\$10,320	923,865	\$0.011
1998 R2000 Base Year	\$13,182	923,865	\$0.014
USPS 1999	\$17,229	893,454	\$0.019

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read 'Tonda F. Rush', written over a horizontal line.

Tonda F. Rush

Arlington, VA 22205
July 31, 2000