

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

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Experimental Presorted  
Priority Mail Rate Categories

Docket No. MC2001-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
JONATHAN D. LEVINE (NAA/USPS-T2-1-5)  
April 30, 2001**

The Newspaper Association of America ("NAA"), hereby submits the attached interrogatories to United States Postal Service witness Jonathan D. Levine (NAA/USPS-T2-1-5) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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April 30, 2001

Certificate of Service

I hereby certify that I have this 30th day of April, 2001, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker  
William B. Baker

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NAA/USPS-T2-1: Please refer to page 6, lines 13-15 of your testimony, where you state "presortation only impacts mail processing and not other functions such as transportation and delivery." Please confirm that your cost estimates do not include an estimate of cost savings arising from preparation in carrier walk-sequence. If you cannot confirm, please explain why not.

NAA/USPS-T2-2: Please refer to the estimated cost savings presented throughout your testimony and summarized at page 7. For each level of presortation, please indicate whether your cost estimates depend upon or otherwise assume any particular volume of presorted pieces at that level.

NAA/USPS-T2-3: Please state whether the estimated cost savings presented at page 7 of your testimony are independent of the number of pieces presorted to that level. In other words, is the cost savings estimate (which you present as cents/piece) equally applicable to a presorted mailing consisting of two pieces as it is to a presorted mailing consisting of 10 pieces, 100 pieces, or 300 pieces? Please explain.

NAA/USPS-T2-4: Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 200 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between the two mailings of which you are aware.

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NAA/USPS-T2-5: Assume four Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the other three each consisting of 100 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between these four mailings of which you are aware.