

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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1
POSTAL RATE COMMISSION
OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS THOMAS W. HARAUSH
(NAA/USPS-T5-1-3)
October 23, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Thomas W. Harahush (NAA/USPS-T5-1-3) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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.

October 23, 2001

William B. Baker
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NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS THOMAS W. HARAUSH
(NAA/USPS-T5-1-3)

NAA/USPS-T5-1. Please refer to your testimony at Page 4, lines 13-14. Are the "randomly selected routes" sampled during each quarter the same routes from quarter to quarter, or does the random selection occur on a quarterly basis? Please explain your answer.

NAA/USPS-T5-2: Please refer to your testimony at Page 4, lines 16-17. When data are recorded at a stop, is the determination of class of mail done solely by the person entering the data, or does a process exist by which a more centralized authority can review or correct the classification?

NAA/USPS-T5-3: Please refer to your testimony at Page 10, Table 10. Is it a correct reading of this Table 2 that for FY2000:

- a. Standard commercial flats are estimated to comprise 70.59 percent, subject to the CV, of the flat mail volume at SDR stops? or
- b. 70.50 percent of the SDR stops that received flat mail, received one or more Standard commercial flats?

In other words, is Table 2 an indication of volume at type of stop, or of proportions of stops receiving one or more types of pieces? Please explain your answer.