

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

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Postal Rate and Fee Changes, 2001

Docket No. PR2001-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE
(NAA/USPS-T31-1-13)
October 26, 2001**


The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Laraine Hope (USPS-T-31) 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 26, 2001


William B. Baker

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NAA/USPS-T31-1: Please refer to Page 9, lines 6 to 8, of your testimony. Were data available from the Base Year in this case that would allow you to determine the cost shares of the commercial and nonprofit subclasses? If so, please explain why you did not use such data.

NAA/USPS-T31-2: Please explain how the estimate for allocating the combined NECR and ECR costs to each subclass was developed. Please provide all calculations.

NAA/USPS-T31-3: Please refer to footnote 11 of your testimony. What is it that makes a discussion of implicit cost coverages for piece-rated and pound-rated mail enlightening "in this instance" of Standard Enhanced Carrier Route mail as opposed to other subclasses of mail?

NAA/USPS-T31-4: If, as you mention at Page 13 of your testimony, one goal in rate design is to bring the piece and pound rated implicit coverages for ECR closer together, why was the pound rate reduced instead of the piece rate being increased above the proposed increase?

NAA/USPS-T31-5: Please refer to tables 5A, 5B, and 5C of your testimony.

- a. Please quantify the amount by which the revenue received from the Standard commercial ECR mail at the weight increments that face a rate reduction under your proposed rates is less than the revenue that would be received from the same weight increments if the current charges for pound-rated mail were unchanged, at Test Year Before Rates volumes.

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- b. Please provide the change in implicit cost coverage between the current and proposed ECR pound rates.

NAA/USPS-T31-6: Please confirm that an advertiser that participates in a shared Standard ECR pound-rated mailing does not pay the pound rate to the Postal Service, but rather pays a price set by the shared mailer. If you cannot confirm, please explain why not.

NAA/USPS-T31-7: Please confirm that an advertiser that participates in a shared Standard ECR piece-rated mailing does not pay the piece rate to the Postal Service, but rather pays a price set by the shared mailer. If you cannot confirm, please explain why not.

NAA/USPS-T31-8: Please confirm that your testimony does not discuss and does not rely on any contentions regarding the prices charged by shared mailers to the advertising participants in their mailings. If you cannot confirm, please explain why not.

NAA/USPS-T31-9: Please confirm that your testimony does not discuss and does not rely on any contentions regarding the prices charged by newspapers to their advertisers for inclusion in newspaper Total Market Coverage programs. If you cannot confirm, please explain why not.

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NAA/USPS-T31-10: Please refer to Page 23, line 18, to Page 24, line 9, where you allude to the concern about "cross-over" to Standard Regular Automation letter rates as a justification for a zero percent passthrough of the letter/flat differential at the Basic ECR tier. Please identify the Standard Regular rate category that is most relevant to this concern, and state the rate for that rate category proposed by witness Moeller.

NAA/USPS-T31-11: Has the Postal Service conducted any study of the cost savings associated with walk-sequencing since the Shipe study that was in evidence in Docket No. R90-1? If so, please provide copies of all such studies.

NAA/USPS-T31-12: Did you consider proposing a new density tier in Standard ECR mail between the High Density and Saturation tiers? If so, please state why you do not propose such a new tier.

NAA/USPS-T31-13: Please refer to Page 26 of your testimony at Table # 7 and lines 11 to 15. Did you consider any alternative rate designs that would have limited the density passthrough between high density and saturation nonletters to 100 percent instead of the 108.3 percent that you propose? If so, please explain what alternatives you considered and why you rejected them. If not, please explain why the passthrough between high density and saturation nonletters in excess of 100 percent did not cause you to consider alternatives.