

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
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LINDA A. KINGSLEY
(NAA/USPS-T-39-1-5)
October 26, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Linda A. Kingsley (USPS-T-39) 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
William B. Baker

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(NAA/USPS-T-39-1-5)**

NAA/USPS-T39-1: Please refer to Page 28, lines 7 to 9, of your testimony.

Please provide the Postal Service's best information regarding:

- a. The total number of routes;**
- b. The number of routes that use vertical flats cases (which you characterize as "most" routes); and**
- c. The number of rates that uses horizontal flats cases.**

NAA/USPS-T39-2: Please describe the physical characteristics of, and how sorting of Standard A Enhanced Carrier Route mail is performed using:

- a. Vertical flats cases**
- b. Horizontal flats cases**

NAA/USPS-T39-3: Please describe the letter casing arrangements for First Class and Standard A mail in offices with:

- a. Vertical flats cases**
- b. Horizontal flats cases**

NAA/USPS-T39-4: 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.

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NAA/USPS-T39-5: Please provide the best information available regarding the average or typical number of delivery points for each of the following types of routes, and indicate the source of the number:

- a. Single Delivery Residential**
- b. Multiple Delivery Residential**
- c. Business and Mixed**