

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
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOSEPH D. MOELLER
(NAA/USPS-T32-1-2)
November 5, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Joseph D. Moeller (USPS-T-32) 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.

November 5, 2001

William B. Baker
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS JOSEPH D. MOELLER
(NAA/USPS-T32-1-2)

NAA/USPS-T32-1: Please refer to Page 10, line 7, through Page 11, line 14, at which you discuss your proposal to increase the pound rate for Standard Regular commercial mail. What is the implicit cost coverage for Standard Regular mail under the proposed rates for pieces above and below the following weights:

- a. 3.0 ounces
- b. 3.5 ounces.

NAA/USPS-T32-2: Why do you not discuss the implicit cost coverages of pound-rated and piece-rated Standard A Regular commercial mail at your proposed rates?