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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS HARAHUSH TO INTERROGATORIES
OF THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T5-1-3)

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of the Newspaper Association of America: NAA/USPS-T5-1-3, filed on October 23, 2001.

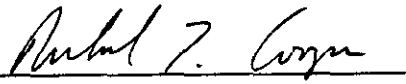
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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November 6, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAUSH
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA

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.

Response:

The random selection occurs on a quarterly basis. Each quarter, prior to sample selection, a current frame of city carrier routes is received from the Address Management System. A new sample is chosen each quarter from the current frame.

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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?

Response:

The determination of class of mail is generally done by the data collector at the time of the test. However, several processes exist for reviewing and/or correcting the classification, as follows:

1. If the data collector is uncertain how to categorize a mailpiece, the data collector can review handbooks and policy memos on the laptop, contact other data collectors or the statistical programs supervisory staff, or record a comment about the mailpiece in the laptop software. The data can be subsequently reviewed and edited, if necessary.
2. As a test is uploaded to the base unit, a summary of weighted counts by class and shape is available for review by the Manager of Statistical Programs or designee, for quality assurance purposes. If clarification is needed about how a mailpiece should be categorized, the office may contact its Statistical Programs Service Center (SPSC), or the headquarters program manager via the SPSC. For the city carrier system, corrections would be made at the base unit computer.
3. At headquarters, the data are reviewed in preparation for summarizing and producing the distribution keys. If an abnormal number of pieces were recorded for a mail class or shape, either for an individual stop or an entire route,

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then headquarters staff contact the data collector for clarification. Errors
identified at this point are corrected by headquarters staff.

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NNA/USPS-T5-3:

Please refer to your testimony at page 10, Table 10 (2). 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 at SDR stops? Or
- b. 70.50 (70.59) 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.

Response:

Table 2 indicates the proportions of volumes by type of stop. Thus, Standard Mail Regular flats comprised 70.59 percent of all flats at SDR stops.

DECLARATION

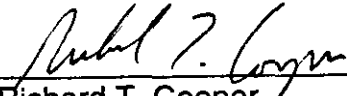
I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Thomas W. Harahush

Date: 11-5-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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