

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

RECEIVED

Postal Rate and Fee Changes, 1997

Aug 15 3 29 PM '97
Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
PAUL G. SECKAR (NAA/USPS-T26-1-2)
August 15, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Paul G. Seckar and respectfully requests a timely and full response under oath.

Respectfully submitted;

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By: William B. Baker
William B. Baker
Michael Yourshaw
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

August 15, 1997

William B. Baker
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
PAUL G. SECKAR (NAA/USPS-T26-1-2)

NAA/USPS-T26-1. Please refer to page 24, lines 7-17 and page 25, lines 4-7 of your direct testimony.

- a. Please explain fully the method used to separate cost pools into "proportional" and "fixed" categories and provide all supporting analyses performed by the Postal Service.
- b. For each of the cost pools shown in Exhibit USPS-T-26D, please explain with respect to what specific variable(s) are the cost pools "proportional" or "fixed."

NAA/USPS-T26-2. Please indicate the extent to which each of the following factors are responsible for the observed differences between modeled flats unit costs and total (proportional plus fixed) benchmark unit costs, and provide supporting Postal Service analyses:

- a. Uncertainty in the piece distribution cost model;
- b. Uncertainty in the bundle sorting cost model;
- c. Uncertainty in the carrier route cost model (for Periodicals and Standard Mail (A) classes); and
- d: Other (non-piece distribution, non-bundle sorting) mail processing operations. Please list the most significant other mail processing operations not included in the modeled flats unit cost, in declining order of importance.