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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL D. BRADLEY
(NAA/ USPS-T14-16-18)
August 20, 1997

The Newspaper Association of America hereby submits the attached

interrogatories to United States Postal Service witness Michael D. Bradley (USPS-T-14)

and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: _William B. Baker_

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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.

William B. Baker

August 20, 1997

William B. Baker

NAA/USPS-T14-16. Please refer to your direct testimony at page 90, lines 24-28.

a.   Please confirm that the variabilities for activities at non-MODS offices are not calculated directly in any of your analyses.

b.   Please confirm that the variability for non-MODS offices is assumed to equal the average or system variability from the MODS offices.

c.   Do non-MODS offices tend to be smaller mail processing facilities compared to MODS offices? Please provide the average size of the non-MODS office and the MODS offices in terms of mail volumes processed.

d.   Did you perform any econometric analyses with the size of the facility as an independent variable? If no, please explain why not. If yes, please provide copies of these analyses.

NAA/USPS-T14-17. Please refer to the direct testimony of Postal Service Witness

Moden (USPS-T-4) at page 22, lines 17-20, where he states:

"In smaller facilities not covered by MODS, sorting schemes are often simpler, the workroom floor is smaller, clerks have greater personal knowledge of the local delivery area, and their very size makes it easier to keep a steady flow of mail to operations such as manual flats and letters."

a.   Is the steady flow of mail to operations such as manual flats and letters likely to result in a higher productivity for these activities at non-MODS offices compared to the productivity of these activities at MODS offices? If no, please explain why not.

b.   Please refer to your direct testimony at page 58, lines 14-17. Please explain fully how a steady flow of mail to manual flat and letter operations would affect the variabilities of these operations.

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MICHAEL D. BRADLEY (USPS-T14-16-18)

NAA/USPS-T14-18. Please refer to the direct testimony of Postal Service Witness

Moden (USPS-T-4) at page 20, lines 23-30 and page 21, lines 1-5.

a. Do you agree that there is likely to be an adjustment period when
    automated equipment is installed at a facility that delays achievement of
    optimal productivity? If no, please explain the basis for your
    disagreement.

b. If such an adjustment period exists, do you agree that productivity during
    this adjustment period would be lower than the productivity achieved after
    the adjustment period? If no, please explain the basis for your
    disagreement.

c. Was any attempt made in your analysis to exclude data during the
    adjustment period of a facility? If yes, please explain what data were
    excluded and on what basis the exclusion was made. If no, please
    explain why not.

d. Was any attempt made in your analysis to segregate the effects of lower
    productivities during the adjustment period or to otherwise account for the
    effect of the learning curve on variabilities? If yes, please explain how
    your analysis accounted for these effects. If no, please explain