

# DOCKET SECTION

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

Postal Rate and Fee Changes, 1997

RECEIVED  
Docket No. R97-1  
Aug 21 3 48 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORY TO  
UNITED STATES POSTAL SERVICE WITNESS  
RALPH J. MODEN (NAA/USPS-T4-17)  
August 21, 1997**

The Newspaper Association of America hereby submits the attached interrogatory to United States Postal Service witness Ralph J. Moden (USPS-T-4) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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.

August 21, 1997

William B. Baker  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORY TO  
UNITED STATES POSTAL SERVICE WITNESS  
RALPH J. MODEN (NAA/USPS-T-17)

NAA/USPS-T4-17. What percentage of Standard ECR basic letters cannot qualify for Standard Other 5-digit Automation rates because the mailing lacks sufficient density to meet the required 150 pieces per 5-digit area? Please explain how you derived this percentage and the provide the source of the data.