

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

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Postal Rate and Fee Changes, 1997  
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-1

SECOND SET OF INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS  
OF THE NATIONAL NEWSPAPER  
ASSOCIATION TO USPS WITNESS PAFFORD  
(NNA/USPS T1-2-6)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatories and request for production of documents to USPS witness Pafford: NNA/USPS-T1, No. 2-6. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

Respectfully submitted,

  
Senny Boone

Tonda F. Rush

Attorneys

National Newspaper Association

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the attached document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: August 29, 1997

  
Senny Boone

**SECOND SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO USPS WITNESS PAFFORD  
NNA/USPS T1-2-6**

2. Please refer to Library Reference H220, report on Case No. 034-1177491, page 8.

a. Please explain how end-of-run data are collected. Please confirm that end-of-run data apply only to automated mail. If you cannot confirm, please explain.

b. Do you agree that end-of-run data would be more reliable than MODS data? If so, please explain why. If not, explain why not.

3. Please cite and explain in detail any actions taken by the Vice President/ Operations Support since the issuance of this report to convert measurement of mail volumes to calculations by piece count rather than by weight and conversion factors. If implementation has not yet occurred, please provide estimates of targeted implementation schedules.

4. Please confirm that audits of DUVRS included in this report covered only delivery units within urban and suburban areas and specifically did not include audits of rural post offices. If you cannot confirm, please explain.

5. Please refer to page 11 of H220. Describe any actions taken by the Postal Service to raise a red flag that would indicate falsification of volume data to show enhanced productivity.

6. Please refer to the Postal Bulletin 21952 dated August 14, 1997.

a. Please provide the estimated date of completion of the National Mail Count on Rural Routes.

b. Has the Postal Service ever conducted a similar rural mail count study before? If so, please provide a report of the study.

c. If the Postal Service has conducted such a study in the past, how were the results used to alter or verify data used for RPW reports or other volume measurement systems?

d. How will the Postal Service use the data from the September 1997 study to alter or verify data used for RPW reports or other volume measurement systems?

e. What percentage of rural carriers were invited to participate in the September 1997 study? What percentage are expected to participate?

- f. Will this study produce data on the total mail volumes handled by individual rural post offices?
- g. Will this study provide mail volume data by class and/or subclass?
- h. Please provide copies of questionnaires and training materials to be used by rural carriers during this test.