

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

RECEIVED

SEP 2 3 22 PM '97

Postal Rate and Fee Changes, 1997

)
)
)
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

THIRD SET OF INTERROGATORIES
OF THE NATIONAL NEWSPAPER
ASSOCIATION TO USPS WITNESS PAFFORD
(NNA/USPS T1-7-12)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatories to USPS witness Pafford: NNA/USPS-T1, No. 7-12. 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

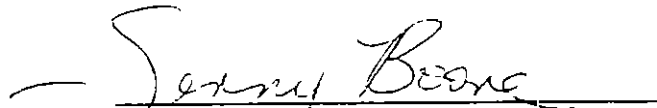
Attorneys

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

**THIRD SET OF INTERROGATORIES
DIRECTED TO USPS WITNESS PAFFORD
NNA/USPS T-1-7-12**

7. Please refer to Table 2, p. 11 of your testimony.

a. Please confirm that the pieces of mail shown on this table are in 1,000s and not in \$1,000s as the heading of the table indicates.

b. Please confirm that the entry N/C in column three of this table indicates that the volumes are estimated by the Non-countable Subsystem of the Revenue, Pieces and Weight System;

c. Please confirm that Table 2 shows an estimate of 877,829 (000) for within county mail in FY 1996.

8. Please refer to page 4, lines 18-22 of your testimony. There you state "These accounts do not provide revenue by rate category, and they provide no volume information at all. To provide this additional detail, information supplied by mailers on mailing statements is gathered from all automated bulk mail entry offices and a stratified sample of offices where the bulk mail entry function has not been automated."

a. For the within county mail on Table 2 of your testimony, how many of the pieces are from the automated bulk mail entry offices?

b. How many are from the sample of offices where the bulk mail entry function has not been automated?

c. Please provide the standard deviation of the volume estimate for the offices where the bulk mail entry function has not been automated.

9. Please refer to pages 8 and 9 of LR H-89 where you describe the RPW Non-Countable System Statistical Documentation. In general, please describe the sampling system for determining the volume of within county mail.

a. How many offices have been automated through the PERMIT system?

b. At how many of these was in county mail entered in FY1996?

10. Page 8 of this library reference states " The remaining offices are stratified into either In-County revenue intensive strata or other strata based on their total second class revenue."

a. Is all within county mail entered either in the offices comprising the within county revenue intensive strata or in an office that has been automated through PERMIT?

b. If no, is all the remaining in-county mail entered through offices in "other strata based on their total second class (Periodicals) revenue."

c. How many offices comprise in-county intensive strata? How many were sampled for in-county mail in FY 1996?

d. How many offices comprise the "other strata based on their second class revenue?"

11. Appendix A-4 of LR 89 is PS form 3541-N while Appendix A-6 is PS Form 3541-R. What is the use of each in determining in-county volumes? Are there differences between the two forms? If so, please describe them. Please state how mailers are instructed on which form to use.

12. Appendix A-18 of LR H-89 is also labeled PS Form 3541N while Appendix A-20 is labeled PS form 3541-R. Please explain why these forms are different from the versions appearing in A-4 and A-6. What is the use of each form in determining in-county volumes? Are differences between these two forms? If so, please describe them.