

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

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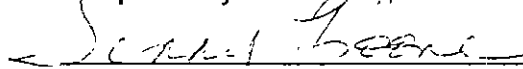
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Postal Rate and Fee Changes, 1997 )  
\_\_\_\_\_)

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

FIRST SET OF INTERROGATORIES  
OF THE NATIONAL NEWSPAPER  
ASSOCIATION TO USPS WITNESS MODEN  
(NNA/USPS T4-1-7)

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 Moden: NNA/USPS-T4, No. 1-7. 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: September 5, 1997



Senny Boone

**FIRST SET OF INTERROGATORIES  
DIRECTED TO USPS WITNESS MODEN  
NNA/USPS T4-1-7**

1. Please provide data indicating by piece, weight and total volume the amount of within-county mail sorted by flat-sorting machines during the base year.
2. Please provide data indicating by piece, weight and total volume the projected amount of within-county periodicals volume projected for flat-sorting during the test year.
4. Please provide data indicating what proportion of within-county mail volumes was letter-shaped as opposed to flat-shaped during the base year. If you cannot provide data, please confirm that the subclass is heavily dominated by flat-shaped mail.
5. Please provide data indicating by piece, weight and total volume the amount of within-county mail sorted by letter-sorting machines during the base year.
6. Please confirm that MPFSM 1000 machines were not in use during the base year and that within-county mail that appeared within the machinable sorts for flats during that year would have been sorted by MPFSM 881 machines. If you cannot confirm, please explain.
7. Please confirm that MPFSM 881 machines are unable to sort periodicals printed on newsprint. If you are unable to confirm, please explain the circumstances in which a periodical printed on newsprint would be sortable by an MPFSM 881.