

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

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Postal Rate and Fee Changes, 2001

POSTAL RATE COMMISSION
Docket No. R2001-1 SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE
(NAA/USPS-T31-14-18)
November 9, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Laraine Hope (USPS-T-31) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

November 9, 2001

William B. Baker
William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE
(NAA/USPS-T31-14-18)**

NAA/USPS-T31-14: Please refer to LR-J-131, work paper 1, page O (rate design formula):

- a. Please explain why test year before rates figures (especially volumes) are used, given that the pound rate input is the proposed rate and the outputs are the proposed rates**
- b. Did you perform any calculations other than set forth in your testimony in determining the pound rate? If so, please provide those calculations.**
- c. Please confirm that your proposed pound rate for Standard ECR mail was selected by you to be an input into the rate design formula. If you cannot confirm, please explain why not.**

NAA/USPS-T31-15: Please refer to page H (Cost) of LR-J-131-WP1. For the Standard ECR delivery cost by density tier data, you cite LR-J-59. However, these data do not seem to be a part of LR-J-59. Please confirm that the source for these data is LR-J-117. If you do not confirm, please provide the correct source.

NAA/USPS-T31-16: Please refer to page H (Cost) of LR-J-131-WP1. Please confirm that the Standard ECR delivery costs for flats presented at that page are different from the Standard ECR delivery costs presented in LR-J-117, Table 1. If the source you cite is LR-J-117, please explain the discrepancy between your delivery cost figures for ECR flats and those in LR-J-117.