

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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-4  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LESLIE SCHENK  
(NAA/USPS-T43-1-9)  
November 9, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Leslie Schenk (USPS-T-43) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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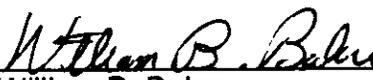
By:

  
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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

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(NAA/USPS-T43-1-9)**

**NAA/USPS-T43-1:** Please refer to Library Reference USPS-LR-J-58, and explain how the volume distributions by destination entry and weight increment given in 'tiers\_table.xls' from the data in LR-J-112 are developed. Please provide specific calculations.

**NAA/USPS-T43-2:** Please refer to Library Reference USPS-LR-J-58, and explain how non-variable costs are calculated and then please explain how those costs are distributed to different subclasses.

**NAA/USPS-T43-3:** Please refer to Library Reference USPS-LR-J-58, and provide all calculations and the results for transportation-related dropship cost avoidance.

**NAA/USPS-T43-4:** Please refer to Library Reference USPS-LR-J-58, and provide all calculations and the results for non-transportation-related and transportation-related dropship cost avoidances separately for each mail subclass.

**NAA/USPS-T43-5:** Please refer to Library Reference USPS-LR-J-58, and state whether non-transportation-related dropship cost avoidances are figured into the total dropship costs?

**NAA/USPS-T43-6:** Please confirm that Table 7 in Library Reference USPS-LR-J-58 presents volumes by units.

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NAA/USPS-T43-7: Please refer to the FY2000 IOCS data set:

- a. Identify the total number of tallies.
- b. Identify the number of tallies that are not dollar-weighted.
- c. Identify the number of tallies with "Leave" activity codes.
- d. Identify the number of tallies that were used to distribute mail processing costs, by class and subclass.

NAA/USPS-T43-8: Please refer to LR-J-58 spreadsheet "LR58AECR.xls," tab "TY MP." Please provide the number of IOCS direct tallies and the number of weighted tallies associated with each distributed mail processing cost figure, by shape, presort level (activity code), handling category (Field F9213: single piece, item, and container), and by weight increment (including no weight).

NAA/USPS-T43-9: Please refer to your response to OCA/USPS-107, wherein you identify 6,497 "letter-shaped unweighted IOCS tallies" for mail processing Cost Segment 3.1 for Standard Regular mail in the 0-1 oz. range. Please also refer to your answer to OCA/USPS-112 (a), which lists 10,442 IOCS direct tallies for Standard Regular letters less than 1 oz. Please explain why these two tally numbers differ.