

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

**NEWSPAPER ASSOCIATION OF AMERICA
THIRD SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LESLIE SCHENK
(NAA/USPS-T43-11-16)
November 26, 2001**

The Newspaper Association of America hereby submits the attached interrogatory 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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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 26, 2001

William B. Baker
William B. Baker

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NAA/USPS-T43-11: Please refer to your response to NAA/USPS-T43-8 and Attachment B thereto. Please provide a table, similar to Attachment B, but presenting unweighted BY00 IOCS tallies by shape and weight increment for Standard Enhanced Carrier Route mail.

NAA/USPS-T43-12: Please refer to your response to NAA/USPS-T43-8 and Attachment B thereto. Please explain the difference between "Single Piece" and "Single Item."

NAA/USPS-T43-13. Please refer to your response to NAA/USPS-T43-8 and Attachment B thereto, which reports 116 weighted IOCS tallies for Single Item letters in the 15 to 16 ounce range. Please explain what Standard ECR letters weigh 15 to 16 ounces.

NAA/USPS-T43-14: In Library Reference LR-J-58, as revised Nov. 20, please refer to the table captioned "Standard Mail ECR Letters Test Year Unit Costs by Detailed (1/2 ounce) Weight Increments," which reports cost and volume figures for Standard ECR letters above 3.5 ounces. Please describe what Standard ECR letters would weigh more than 3.5 ounces.

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NAA/USPS-T43-15: In Library Reference LR-J-58, as revised Nov. 20, please refer to the table captioned "Standard Mail ECR Flats Test Year Unit Costs by Detailed (1/2 ounce) Weight Increments:

- a. Please explain why the unit costs for 8-9 ounce flats are less than the unit costs of 7-8 ounce flats.
- b. Please explain why the unit costs for 11-12 ounce flats are less than the unit costs of 10-11 ounce flats

NAA/USPS-T43-16: In Library Reference LR-J-58, as revised Nov. 20, please refer to the table entitled Standard Mail ECR Flats Test Year Unit Costs by Function.

- a. Please explain why, between the "0 to 1" and "2 to 3" ounce ranges, City Carrier in-office unit costs decline while City Carrier Street Time unit costs rise.
- b. Please explain why the City Carrier In-office costs of Standard ECR flats weighing 5 to 7 ounces (0.83 cents) is less than the unit City Carrier In-office costs of Standard ECR flats between 3 to 5 and 7 to 9 ounces.
- c. Please explain why the unit City Carrier In-office costs of Standard ECR flats weighing 11 to 13 ounces is less than the unit City Carrier In-office costs of Standard ECR flats weighing between 0 and 2 ounces.