

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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS GEORGE S. TOLLEY
(NAA/USPS-T7-12-13)
November 26, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness George S. Tolley (USPS-T-7) 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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SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS GEORGE S. TOLLEY
(NAA/USPS-T7-12-13)**

NAA/USPS-T7-12: Please confirm that your volume forecasts for the Test Year were prepared before the September 11, 2001, attacks and the more recent discovery of anthrax-laden letters in the mail.

NAA/USPS-T7-13: Please describe, in general terms, how you would take the changes in mail volumes since the September 11 attacks and the anthrax letters into account in the future if you were to prepare volume forecasts for a later year. In particular, please explain whether you would need to make a judgment as to whether declines in mail volume since September 11 are essentially "one-time" phenomena, or whether they reflect persistent trends in mail volume that your model would need to take into account. In addition, please indicate the minimum period of time that you believe would be necessary in order to make that judgment.