

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF
NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T28-16-18)

The United States Postal Service hereby provides the responses of witness Moeller to the following interrogatories of Newspaper Association of America: NAA/USPS-T28-16 through 18, filed on November 16, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

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November 29, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 29, 2001

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NAA/USPS-T28-16: Please refer to your responses to AAPS/USPS-T28-3(a) and NAA/USPS-T28-13.

- a. Please confirm that your accurate quotation from the Docket No. R2000-1 proceeding is, in fact, from page 3 of the rebuttal testimony of Newspaper Association of America witness William Wilson.
- b. Please confirm that in Docket No. R2000-1, the testimony of witness White was sponsored by AAPS, not by NAA.
- c. Does the fact that you have twice quoted this passage indicate that you agree with it? Please explain any response other than an unqualified affirmative.

RESPONSE:

- a. Confirmed, with apologies to Mr. Wilson and the Newspaper Association of America.
- b. Confirmed.
- c. As I stated in the cited response to interrogatory NAA/USPS-T28-13, I am a bit wary of the use of the term “competitor” when describing the relationship between newspapers and the Postal Service, and so, apparently, is Mr. Wilson. My citation of his testimony is included in order to note the fact that newspapers are often customers of the Postal Service. With regard to Total Market Coverage products, Mr. Wilson notes that “almost all large papers now use the mail.”

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NAA/USPS-T28-17: Imagine that a large national saturation mailer of shared mail products owns an alternate delivery system that delivers its products in some markets, and the Postal Service in others. Would such a large national saturation mailers [sic] both a customer and a competitor of ECR mail?

RESPONSE:

It is unclear what the question is asking, as a verb is missing. Nevertheless, in this example, the large national saturation mailer of shared mail products would be both a customer and a competitor of ECR mail.

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NAA/USPS-T28-18: Please refer to your response to POIR No. 2. Question 6. and witness Hope's WP1, page Q. Please reconcile your figure for Commercial ECR postage of \$5541,973 (in '000s) with witness Hope's ECR revenue from rates (line 28) of \$5538,863 (in '000s).

RESPONSE:

The cited figure from witness Hope's WP1, page Q, does not include the revenue from the Residual Shape Surcharge (RSS), which is listed on line 30 of page Q. The revenue from the RSS is \$3,111 (in 000s). When this revenue is added to the \$5,538,863 (in 000s) cited in the question, the total is \$5,541,973 (in 000s) after rounding to the nearest \$1,000. This matches the cited figure from my POIR response.