

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

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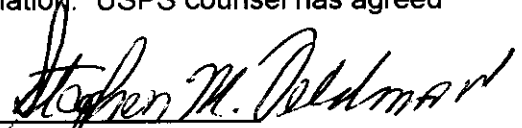
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

FOLLOW-UP INTERROGATORIES (CRPA-NFIP/USPS-T41-
1-4) TO USPS WITNESS L. PAUL LOETSCHER
(January 14, 2002)

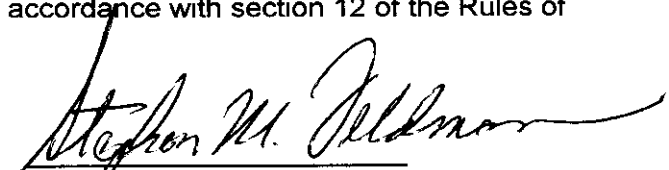
The Coalition of Religious Press Associations (CRPA) and the National Federation of Independent Publications (NFIP) hereby file follow-up interrogatories to USPS Witness Loetscher. CRPA-NFIP served notice of their intent to conduct oral cross-examination of Witness Loetscher on January 10, 2002, when he was scheduled to appear before the Commission. Since CRPA-NFIP was the only party noticing intent to cross-examine the witness, CRPA-NFIP agreed to a request by USPS that it reconsider its request, given that the witness would have had to fly in from Wisconsin just to answer light oral cross-examination.

In lieu of oral cross, CRPA-NFIP suggested to USPS that several follow-up interrogatories could be served to secure similar information as oral cross-examination. USPS counsel has agreed with that proposal as a reasonable procedure.


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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 Procedure.


Stephen M. Feldman, Esq.

January 14, 2002

CRPA-NFIP/USPS-T-41-1

(a) In your response to CRPA-NFIP/USPS-T-34-14(d), redirected to you from Witness Taufique, you report that 91 of 256 Nonprofit publications with “measurable zone distribution and an estimated issue size between 0-1,000 copies mailed more than 50 percent of there [sic] copies at DDU, DSCF or Zone 1&2 rates.”

Confirm that USPS data which are presented in this response also show that in addition to the 256 publications described above, there also are 3,974 nonprofit publications with circulations per issue of 0-1,000 which report 0 advertising percentage for all mailings in FY2000, and for which no destination entry data are currently available.

(b) Confirm that the 91 nonprofit publications in the 0-1,000 circulation stratum which you describe as having 50% or more of copies dropshipped to DDU, SCF or Zone 1&2 entry points represent only 2.15% of the total (4,230) publications in the nonprofit publications category which have estimated issue sizes of 0-1,000 copies per issue.

CRPA-NFIP/USPS-T41-2

In your response to CRPA-NFIP/USPS-T34-14(e), you refer to publications that enter mail at both Nonprofit Periodicals and Regular Periodicals rates. Please clarify how a publication can enter at both Nonprofit and as Regular Rates.

CRPA-NFIP/USPS-T41-3

(a) Your response to MPA/USPS-T34-2, redirected to you from Witness Taufique, states that “The PERMIT system collects Postage statement data (form 3541) for

roughly 95 percent of Periodicals Outside-County mail Trial Balance revenue.” What percent of total Periodicals Outside-County *publications* does the PERMIT system represent?

(b) Please supply the same information requested in part (a) separately for Regular-Rate, Nonprofit, and if necessary, Science of Agriculture publications.

CRPA-NFIP/USPS-T41-4

Your table 1 which follows your response to MPA/USPS-T34-2, shows a total of 25,872 Periodicals mailed Outside-County in FY 2000.

(a) Of the 25, 872, how many are Nonprofit, and how many are Regular-Rate?

(b) How many periodicals are there in the Outside-County subclass in addition to the 25,872 “PERMIT System Periodicals Outside-County” publications listed in your table 1, MPA/USPS-T34-2?

(c) Of the non-PERMIT periodicals, the number of which is requested in part (b), how many are Regular-Rate and how many are Nonprofit? In providing this information, please identify the source, form or database from which you derive that information.

(d) Please confirm that of the 25, 872 publications counted by the PERMIT system as shown in table 1, 12,487 report annual advertising percentages of 0-10%, or 48.3% of the total number of outside county publications in the PERMIT database.