

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

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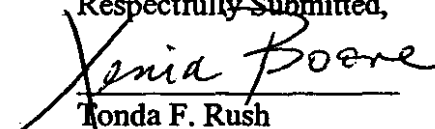
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

FIRST SET OF INTERROGATORIES BY
THE NATIONAL NEWSPAPER ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS
HERBERT B. HUNTER III
(NNA/USPS-T4-1-9)

Pursuant to the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatories to the United States Postal Service Witness Herbert B. Hunter III (NNA/USPS-T4-1-9). If any request should be answered by a different witness, it should be referred to that witness.

Respectfully Submitted,


Tonda F. Rush
King & Ballou
P.O. Box 50301
Arlington, VA 22205

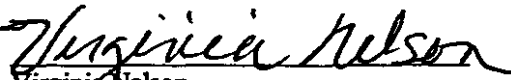
Xenia Boone
National Newspaper Association
1010 N. Glebe Road
Arlington, Virginia, 22201

Counsel for the National Newspaper
Association

CERTIFICATE OF SERVICE

I hereby certify that I have this date served this document in accordance with Section 12 of the Commission's Rules of Practice.

Dated: 12/03/01


Virginia Nelson

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NNA/USPS-T4-1. Please confirm that AIC 135 is an account code for Within County Periodicals revenue. If you do not confirm, please explain the function and purpose of AIC 135.

NNA/USPS-T4-2. If your answer to Interrogatory #1 is negative, please provide the revenue account code used in the BRPW for Within County Periodical revenue.

NNA/USPS-T4-3. Please respond to the following questions regarding the revenue account code for Within County Periodical revenue:

- a. the date AIC 135, or the appropriate account code given in your response to Interrogatory #2, was first used;
- b. whether this account code was used throughout the base year;
- c. whether this account code reports any revenues that are not from within county periodicals postage or fee payments;
- d. whether Within County Periodicals postage payments are reported in any other AIC besides AIC 135.
- e. please confirm that the revenue totals for Government Fiscal Year 2000, as shown in your Table 1, are comprised solely of AIC 135 reported revenues, and if you do not confirm, please explain what the revenue totals are comprised of.

NNA/USPS-T4-4. Please confirm that Within County Periodical volumes are measured in part from postage information obtained from a panel of post offices.

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NNA/USPS-T4-5. If your answer to Interrogatory #4 is positive, please provide a table indicating the number of post offices measured, by strata.

NNA/USPS-T4-6. Did the panel of post offices measured during the base year differ in any way from the panel measured in the base year of Omnibus Rate Case R2000-1? If your answer is yes, please explain fully how the panel differed.

NNA/USPS-T4-7. Does the volume total for Within County Periodicals reported in your Table 2 consist of the sum of pieces measured by the PERMIT system and the total volume produced by the panel of offices discussed in interrogatory #5? If it does not, please explain in detail how the total was derived.

NNA/USPS-T4-8. If the AIC 135, or the appropriate account code given in response to Interrogatory #2, was fully operational during the base year of this case, please fully explain any changes required in your methodology for the measurement of total pieces or total volumes during the base year, as compared to the base years in prior omnibus rate cases R2000-1 and R97-1.

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NNA/USPS-T4-9. Does the use of AIC 135 revenue information, or the appropriate account code given in response to Interrogatory #2, when matched to the outputs of the volume totals for within county mail produced by the PERMIT system and the sampling system, require a "true-ing up" to obtain final volume totals reported in your Table 2? If so, please provide a worksheet showing the process you used. If not, please confirm that the outputs of the revenue account system and the volume reporting system were sufficient to produce Tables 1 and 2 without further adjustment.