

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

Postal Rate and Fee Changes, 1997

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Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
MICHAEL A. NELSON (NAA/USPS-T19-1-4)**

**September 12, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Michael A. Nelson (USPS-T19) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:



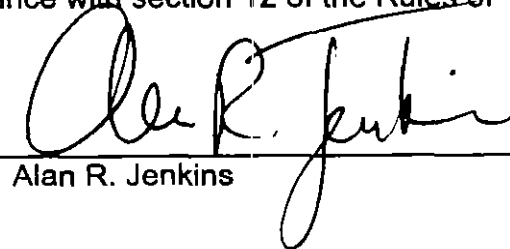
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

September 12, 1997



Alan R. Jenkins

NEWSPAPER ASSOCIATION OF AMERICA  
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NAA/USPS-T19-1. Please refer to Exhibit USPS-19B of your direct testimony.

Concerning the follow-up survey of supervisors of sampled routes with routine loops/dismounts:

- a. **How many surveys were distributed?**
- b. **Out of this total, how many supervisors ultimately responded to the survey?**
- c. **Did the Postal Service, or contracting firm conducting the follow-up survey, perform any activities to ensure the quality of the data generated by the survey? If so, please describe these activities. If no, please explain why not.**
- d. **Was the survey pre-tested? If so, please provide a detailed description of the pre-testing procedures. If no, please explain why not.**
- e. **Did the Postal Service, or contracting firm conducting the follow-up survey, conduct any training activities to ensure the responding supervisors understood the purpose of the survey and information being collected? If so, please describe these activities. If no, please explain why not.**

NAA/USPS-T19-2. Please refer to your Workpaper 1.14.

- a. For the following items cited by respondents to the follow-up survey as being factors in establishing dismounts, please explain how each factor results in establishing a dismount *regardless of the volume or weight of the mail*:
  1. Parcels
  2. Office Buildings/Business
  3. Apts.
  4. Combination: apts./offices/schools
  5. Distance between delivery points

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INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
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- b. Would light-weight, small parcels result in establishing a dismount to the same degree as heavier, bulkier parcels? Please explain.
- c. If the weight of the mail for an office building or apartment is extremely light, is a dismount established for other reasons? Please explain.
- d. For the following items cited by respondents to the follow-up survey as being factors in establishing loops, please explain how each factor results in establishing a loop *regardless of the volume or weight of the mail for that loop*:
  - 1. Numerous Dismounts
  - 2. Light Volume
  - 3. Line of Travel
  - 4. Deliveries across the street
- e. Please explain how and why numerous dismounts result in establishing a loop.
- f. If the numerous dismounts were established to handle heavy volumes of mail, will a loop be established? Please explain.
- g. Please define the following terms and explain why loops are established due to these factors:
  - 1. "Line of Travel"
  - 2. "Deliveries across the street"
- h. Please explain and define the 3 largest subcategories of "Other" under Stops B - Dismounts Due to Other Factors.
- i. Please explain why it is appropriate to calculate the variability factor (0.4099) based on a denominator that includes the number of total loops and number of dismounts due to other factors. In other words, explain why this is not an "apples to oranges" comparison.

NAA/USPS-T19-3. Please provide copies of your testimony on behalf of the United Parcel Service in Docket Nos. RM86-2B, R87-1 and R90-1.

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NAA/USPS-T19-4. Please refer to your response to ADVO/USPS-T19-9.

- a. Please explain why the proxy variability figure (0.4099) used for Dismounts Due to Volume/Weight is more appropriate than a proxy variability figure that compares the percentage to volume variability of loops.  $(242,294,460/85,273,149+242,294,460)$ .