

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

Postal Rate and Fee Changes, 1997

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SEP 12 3 40 PM '97  
Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

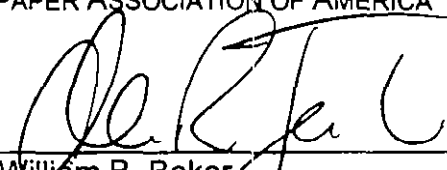
**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
STEVEN H. WADE (NAA/USPS-T20-1-4)  
September 12, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Steven H. Wade (USPS-T-20) 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

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UNITED STATES POSTAL SERVICE WITNESS  
STEVEN H. WADE (NAA/USPS-T20-1-4)**

NAA/USPS-T20-1. Please refer to pages 6 and 7 of your direct testimony. You describe the survey of Plant and Distribution facilities.

- a. Please discuss all factors that might lead respondents to the survey to underestimate average annual load factors.
- b. If, in your opinion, estimates of load factors are likely to be underestimated, please provide an estimate of the likely magnitude of this downward bias.
- c. Please discuss all factors that might lead respondents to the survey to overestimate average annual load factors.
- d. If, in your opinion, estimates of load factors are likely to be overestimated, please provide an estimate of the likely magnitude of this upward bias.

NAA/USPS-T20-2. Please discuss why your preferred estimate of volume variability for VSD hours is higher than those proposed in previous rate hearings, including R77-1, R80-1, R84-1, R87-1, R90-1, and R94-1.

NAA/USPS-T20-3. In your opinion, does your method for estimating volume variability of VSD hours improve on the methods employed in previous rate hearings? Please explain your response.

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NAA/USPS-T20-4. In your opinion, does your method provide more accurate estimates of volume variability of VSD hours relative to estimates employed in previous rate hearings? Please explain your response.