

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PAFFORD TO INTERROGATORIES OF
THE NATIONAL NEWSPAPER ASSOCIATION
(NNA/USPS-T1-7-12)

The United States Postal Service hereby provides responses of witness Pafford to the following interrogatories of the National Newspaper Association: NNA/USPS-T1-7-12, filed on August 29, 1997.

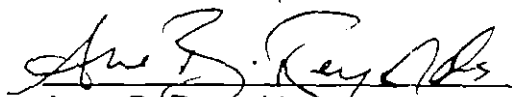
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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September 12, 1997

ANSWERS OF BRADLEY V. PAFFORD
TO INTERROGATORIES OF THE
NATIONAL NEWSPAPER ASSOCIATION

NNA/USPS-T1-7.

Please refer to Table 2, p. 11 of your testimony.

- a. Please confirm that the pieces of mail shown on this table are in 1,000s and not in \$1,000s as the heading of the table indicates.
- b. Please confirm that the entry N/C in column three of this table indicates that the volumes are estimated by the Non-countable Subsystem of the Revenue, Pieces and Weight System;
- c. Please confirm that Table 2 shows an estimate of 877,829 (000) for within county mail in FY1996.

NNA/USPS-T1-7.

RESPONSE:

- a. Confirmed.
- b. Not Confirmed. N/C implies "Not Computed."
- c. Confirmed.

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- NNA/USPS-T1-8. Please refer to page 4, lines 18-22 of your testimony. There you state[:] "These accounts do not provide revenue by rate category, and they provide no volume information at all. To provide this additional detail, information supplied by mailers on mailing statements is gathered from all automated bulk mail entry offices and a stratified sample of offices where the bulk mail entry function has not been automated."
- a. For the within county mail on Table 2 of your testimony, how many of the pieces are from the automated bulk mail entry offices?
 - b. How many are from the sample of offices where the bulk mail entry function has not been automated?
 - c. Please provide the standard deviation of the volume estimate for the offices where the bulk mail entry function has not been automated.

- NNA/USPS-T1-8. Response:
- a. An estimated 736,644 (000) pieces.
 - b. An estimated 141,185 (000) pieces.
 - c. The standard deviation of the volume estimate is unknown.

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- NNA/USPS-T1-9. Please refer to pages 8 and 9 of LR H-89 where you describe the RPW Non-Countable System Statistical Documentation. In general, please describe the sampling system for determining the volume of within county mail.
- a. How many offices have been automated through the PERMIT system?
 - b. At how many of these was in [-] county mail entered in FY 1996?
- NNA/USPS-T1-9. The sampling system has been described in my testimony on pages 4 and 5, and in LR H-89.
- a. At the end of FY 1996, there were 1,671 PERMIT System offices.
 - b. At the end of FY 1996, in-county data were obtained from 1,375 PERMIT System offices.

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NNA/USPS-T1-10. Page 8 of this [LR H-89] library reference states [:]
"The remaining offices are stratified into either In-County revenue intensive strata or other strata based on their total second class revenue."

- a. Is all within county mail entered either in the offices comprising the within county revenue intensive strata or in an office that has been automated through PERMIT?
- b. If no, is all the remaining in-county mail entered through offices in "other strata based on their total second class (Periodicals) revenue[?]"
- c. How many offices comprise in-county intensive strata? How many were sampled for in-county mail in FY 1996?
- d. How many offices comprise the "other strata based on their second class revenue?"

NNA/USPS-T1-10. Response:

- a. No.
- b. Yes.
- c. There are 5,902 offices in this population, and 42 were sampled for FY 1996.
- d. There are 201 offices comprising this population.

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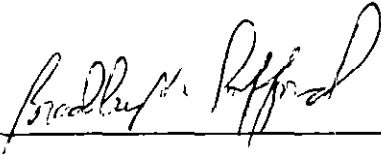
- NNA/USPS-T1-11. Appendix A-4 of LR 89 is PS form 3541-N while Appendix A-6 is PS Form 3541-R. what is the use of each in determining in-county volumes? Are there differences between the two forms? If so, please describe them. Please state how mailers are instructed on which form to use.
- NNA/USPS-T1-11. PS form 3541-R is for periodicals receiving regular and science of agriculture rates (outside-county rates), unless a portion (all) of the mailing is entered within the county in which the post office of original entry is located for delivery to addresses within that county. In this case the mailer receives in-county rates. PS form 3541-N is similar except that the outside-county rates apply to special and classroom periodicals.

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- NNA/USPS-T1-12. Appendix A-18 of LR H-89 is also labeled PS Form 3541N while Appendix A-20 is labeled PS form 3541-R. Please explain why these forms are different from the versions appearing in A-4 and A-6. What is the use of each form in determining in-county volumes? Are differences between these two forms? If so, please describe them.
- NNA/USPS-T1-12. To the best of my knowledge the only change was the mail class name from second class to periodicals as a result of the MC95-1. The rate categories and rates remained the same.

DECLARATION

I, Bradley V. Pafford, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 9-12-97

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.


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