

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

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Postal Rate and Fee Changes, 1997

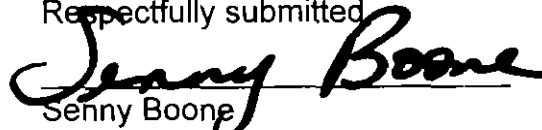
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

FIRST SET OF INTERROGATORIES
OF THE NATIONAL NEWSPAPER
ASSOCIATION TO USPS WITNESS TOLLEY
(NNA/USPS T6-1-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatories to USPS witness Tolley: NNA/USPS-T6, No. 1-2. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

Respectfully submitted



Senny Boone
Tonda F. Rush
Attorneys
National Newspaper Association

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the attached document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: September 12, 1997


Senny Boone

**FIRST SET OF INTERROGATORIES
DIRECTED TO WITNESS TOLLEY
NNA/USPS T6-1-2**

1. Please refer to your testimony at pages 80-85.
 - a. Do you agree that the changes in requirements for within-county mail referenced by you in Public Law 99-0272 would have had an immediate effect upon volumes immediately after its implementation but in succeeding years (e.g., 1987 and on) would have no further significant effect upon depressing year-to-year volumes. If you do not agree, please explain.
 - b. Please provide any data upon which you relied indicating the use of within-county mail by the daily newspapers described in your subparagraph B.3.f.ii.a. Please provide any data upon which you relied indicating that in the period from 1970-1986 daily newspapers were significant users of within-county mail.
 - c. In considering the decline in within-county volumes, did you examine the record in R94-1 in which the method of tabulating within-county pieces, weights and revenues was at issue? If so, please explain how that information influenced your testimony in this case.
2. Please refer to your statement on page 85 in subparagraph (b), in which you state: "another change in the newspaper industry affecting periodical in-county mail is the growth of weekly newspapers relative to daily newspapers."
 - a. Did you look at any data concerning the circulations of weekly newspapers versus daily newspapers?
 - b. If you did look at those data, please provide the circulation numbers you relied upon and explain how they influenced your testimony.
 - c. Please explain in detail what assumptions you made about the mitigating effect of the growth of weekly newspapers upon within country mail volume growth.
 - d. Please confirm that ownership of individual newspaper titles by large chains of newspapers, whether weekly or daily, would not necessarily have an effect upon mail volumes, so long as that ownership did not result in a decline in overall numbers of newspapers and corresponding circulations relative to those of previous years. If you do not confirm, please explain.
 - e. Did you examine frequencies of newspapers that may have been less frequent than daily and more frequent than weekly? if so, please explain how their circulations influenced your testimony about within-county mail volumes.