

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

Postal Rate and Fee Changes, 1997

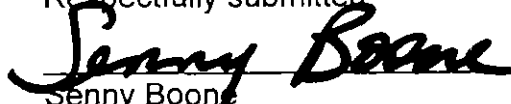
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

FIRST SET OF INTERROGATORIES
OF THE NATIONAL NEWSPAPER
ASSOCIATION TO USPS WITNESS DEGEN
(NNA/USPS T12-1-5)

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 Degen: NNA/USPS-T12, No. 1-5. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

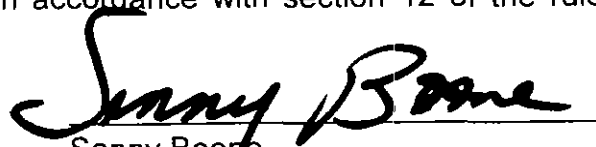
Respectfully submitted


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 DEGEN
NNA/USPS T12-1-5**

1. Please list the steps the Postal Service has taken to correct the error in IOCS data for within-county identified by you in R94-1 as affecting the volume data used in that case.
2. Please refer to the Commission's discussion of the within-county tallies in PRC Op R94-1 at paragraphs 3074-77.
 - a. Did the Postal Service quantify the effect of the error on within-county volumes or costs or both for any of the years prior to base year in R94-1?
 - b. If the Postal Service did quantify the effect of the error, please provide the results.
3. Please list the steps the Postal Service takes to identify periodicals tallies as within-county.
4. Please list any differences in the method used in the base year in this case to identify periodicals tallies as within-county compared to the method used for the base year in R94-1.
5. Please provide the total number of IOCS raw tallies underlying Cost Segments 3 and 6 (separately) for each year from FY 1986 to FY 1996. For Periodicals Class - In-County mail, please provide the number of IOCS raw tallies underlying Cost Segments 3 and 6 (separately) for each year from FY 1986 to FY 1996.