BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 SEP | 5

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COALITION OF RELIGIOUS PRESS ASSOCIATIONS
FIRST INTERROGATORIES
TO POSTAL SERVICE WITNESS GEORGE S. TOLLEY (CRPA/USPS-T6-1-3)
(September 11, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission's Rules of Practice, the Coalition of Religious Press Associations (CRPA) hereby submits interrogatories. If necessary, please redirect any interrogatory to a more appropriate Postal Service witness.

Respectfully submitted,

Dr. John Stapert

Coalition of Religious Press Associations

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above-named document upon all parties of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Dr. John Stapert

September 11, 1997

CRPA/USPS-T-6-1

Please refer to page 88 of your testimony, lines 6ff., and to (the there-referenced) Chart E on page 89. How dependable, for current rate-setting purposes, are the data from the Preferred Rate Study which was conducted more than ten years ago?

CRPA/USPS-T-6-2

Has there been any attempt by the Postal Service to obtain more recent data on the distribution and total annual volume of periodical nonprofit mail than the data summarized in Chart E? If so, please describe such attempts.

CRPA/USPS-T-6-3

Please refer to your testimony on pages 92 and 101, each of which attributes mail-volume changes to "other factors." In the case of nonprofit periodical mail, you state that "other factors"—that is, factors which cannot be specifically identified—were responsible for a -10.10 percent impact on volume from 1992 to 1997. But in the case of regular-rate periodical mail, "other factors" had only a -4.27 percent impact on volume. How do you account for the much greater degree of "other factors" impact on nonprofit periodical mail than on regular-rate mail?