

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

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Postal Rate and Fee Changes, 1997

Docket No. P-97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MOHAMMAD A. ADRA (NAA/USPS-T38-1-5)
September 15, 1997**

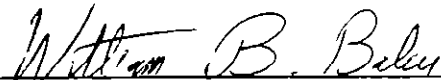
The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Mohammad A. Adra (USPS-T-38) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By:




William B. Baker
Michael Yourshaw
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

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 15, 1997


William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
MOHAMMAD A. ADRA (NAA/USPS-T38-1-5)

NAA/USPS-T38-1. Please refer to page 8, lines 2 through 10 of your testimony. Please describe what "weight-related non-transportation costs" the BPM per-pound rate element is intended to recover.

NAA/USPS-T38-2. Please refer to page 8, lines 12 through 20 of your testimony. Please describe the different categories of "non-transportation costs" that the BPM per-piece rate element is intended to recover?

NAA/USPS-T38-3. Please refer to page 8, lines 15-20 of your testimony.

- a. Please explain why the BPM per-piece charge is the same for all nonlocal zones.
- b. Please identify and explain the reasons why the BPM single-piece, per-piece charge is twice the bulk, per-piece charge.
- c. Please identify and explain the reasons why the BPM local per-piece charge is 75 percent of the non-local per-piece charge.

NAA/USPS-T38-4. Please refer to your testimony at page 14, lines 5 through 12. Please identify and explain the reasons why the Special Standard Mail rate structure has three-tiers.

NAA/USPS-T38-5. Please refer to page 14, lines 5 through 12. Please identify separately the theoretical purposes of the first pound rate and of the separate lower pound rate for additional weight up to 7 pounds.