BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 2026& CEIVE()

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OSTAL ROTOCKET NON R97-1

THIRD SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION TO USPS WITNESS MODEN (NNA/USPS-T4-8-9)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatory to USPS witness Moden: NNA/USPS-T4, Nos. 8-9. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

Respectfully submitted,

Tonda Rush Senny Boone 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 17, 1997

Sandra S. King

THIRD SET OF INTERROGATORIES DIRECTED TO WITNESS MODEN NNA/USPS-T4-8-9

- 8. Please refer to your statement on page 12, lines 13-27, referring to the permissive shift of non-barcoded flats to the 5-digit sack for service reasons when the package would otherwise not qualify.
 - a. Please provide any data indicating the volume of Periodicals mail affected by these service-related shifts.
 - b. If you do not have data on the volume involved in these shifts, please indicate whether you believe the publishers' election to use this sacking option have been rising or falling since the base year in R94-1.
 - c. How would you expect the proposed new rate structure for Periodicals mail to affect this behavior by publishers?
- 9. Please refer to your testimony on pages 18-19.
 - a. Please confirm that the Postal Service maintains a Surface Preferential Mail Network.
 - b. Please describe the network.
 - c. Does the network direct Periodicals mail through Bulk Mail Centers or other mail processing facilities or both?
 - d. If both types of facilities are used, how does the Postal Service determine whether to handle Periodicals volume at Bulk Mail Centers as opposed to other mail processing centers.
 - e. What percentage of regular rate subclass Periodicals mail is handled through Bulk Mail Centers?