

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

Postal Rate and Fee Changes, 1997

RECEIVED  
Docket No. ~~SPR97~~ 1 3 29 PM '97

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
PETER HUME (NAA/USPS-T18-1-2)  
September 16, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Peter Hume (USPS-T-18) and respectfully requests a timely and full response under oath. If Mr. Hume cannot answer the interrogatories, please redirect them to an appropriate person.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:



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

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

**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 16, 1997

  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
PETER HUME (NAA/USPS-T18-1-2)

NAA/USPS-T18-1. Please identify, describe and provide the cost studies that the Postal Service has performed within the last five years in order to determine the effect that weight has on costs and the classification of costs in cost segments 6, 7 and 10 for Standard Mail.

NAA/USPS-T18-2. Has the Postal Service analyzed, within the last five years, the effect that weight has on component costs within cost segments 6, 7 and 10 for Standard Mail? If yes, please describe and provide a copy of such analysis. If no, please explain why not?