

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

RECEIVED

SEP 15 12 18 PM '97

Postal Rate and Fee Changes, 1997

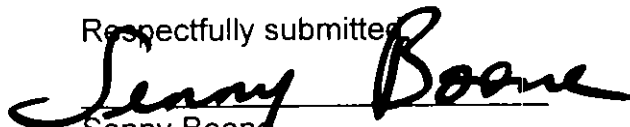
)
)
)
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

FIRST SET OF INTERROGATORIES
OF THE NATIONAL NEWSPAPER
ASSOCIATION TO USPS WITNESS TAUFIQUE
(NNA/USPS T34-1-9)

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 Taufique: NNA/USPS-T34, No. 1-9. 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

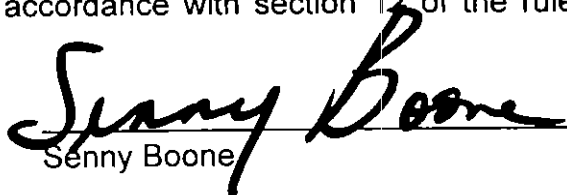
Attorneys

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 TAUFIQUE
NNA/USPS T34-1-9**

1. Please refer to your testimony on Table III. Please confirm that the pound rate in within-county "zoned advertising delivery unit" proposed rates is intended to apply only to advertising weight. If you do not confirm, please explain.
2. Please consult the Domestic Mail Manual § 3.0 with reference to Exceptional Dispatch.
 - a. Please explain in detail all differences between periodicals mail prepared to qualify for delivery unit discounts on the within-county and regular periodicals rate schedule and mail prepared and sorted for exceptional dispatch.
 - b. Does your answer depend upon the degree of sortation provided by the mailer in each instance? If so, please explain.
 - c. Please explain in particular any circumstances of which you are aware in which a mailer authorized to drop ship for exceptional dispatch would not receive delivery unit discounts.
3. Please list any and all reasons why a periodical granted exceptional dispatch privileges under DMM § 3.0 would not qualify for delivery office discounts.
4. Please describe any changes that the Postal Service has publicly discussed since June 1, 1997, regarding sortation, packaging or sacking of Periodicals mail to Sectional Center Facilities and provide copies of any memoranda, reports or press announcements regarding this intended change. If you do not confirm, please explain. Please describe any effects such a change, if any, would have upon the test year costs or rates proposed in this case.
5. Please provide estimates of the percentages of Periodicals the Postal Service estimates will use the newly proposed basic, 3-digit, 5-digit and carrier route rates.
6. Please refer to your description of periodicals mail on page 4 of your testimony.
 - a. Please provide any studies or surveys indicating what percentage of within-county periodical mail represents the following categories described by you: magazines, newspapers, newsletters and bulletins.

7. Please explain your statement on page 20 of your testimony: "passthroughs used for Within-County rates are by necessity much smaller than other classes because the cost study used is for Nonprofit mail."
 - a. Please confirm that the study referenced in this statement was filed by the Postal Service as LR-H-111. If you do not confirm, please provide this study.
 - b. Please explain in detail why it calls for mitigation of passthroughs for within-county.
 - c. Are you sponsoring LR-H-111 in this case? If not, to your knowledge, is any other witness sponsoring that study for use in this case?
 - d. If the Postal Service had not decided to assign all non-transportation cost savings to the piece rate for within-county periodicals, what would the discounts for the piece and pound rates have been?
8. What percentage of Periodicals mail consists of letter-shaped mail? What percentage of within-county mail consists of letter-shaped mail?
9. Please provide copies of any studies or data by the Postal Service that addresses the questions of the percentage of within-county mail delivered:
 - a. On rural routes?
 - b. On routes with fewer than 400 stops?
 - c. In box sections?