

DOCKET SECTION

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

RECEIVED  
SEP 24 4 25 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

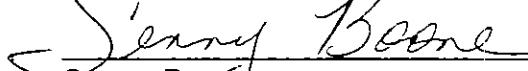
\_\_\_\_\_  
Postal Rate and Fee Changes, 1997 )  
\_\_\_\_\_) )  
\_\_\_\_\_)

Docket No. R97-1

FOLLOW-UP INTERROGATORIES  
OF THE NATIONAL NEWSPAPER  
ASSOCIATION TO USPS WITNESS PAFFORD  
(NNA/USPS T1-15-17)

Pursuant to rule 2-(D) of the Commission's Special Rules of Practice governing discovery in this case, the National Newspaper Association hereby submits the attached follow-up interrogatories to USPS witness Pafford: NNA/USPS-T1, No. 15-17. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.

Respectfully submitted,

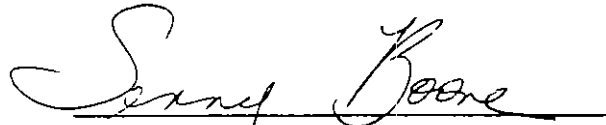


Senny Boone  
Tonda F. Rush  
Attorneys  
National Newspaper Association

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 24, 1997

  
Senny Boone

**FOLLOW-UP INTERROGATORIES  
DIRECTED TO WITNESS PAFFORD  
NNA/USPS T1-15-16**

15. Please refer to your response in part c of NNA/USPS T1-7. Please explain why you did not provide the coefficient of variation for within county mail. Please provide it.

16. Please refer to your response to part c of NNA /USPS T1-8. There you say you do not know the standard deviation for the estimate of within county mail from the offices where the bulk mail entry function has not been automated. Your testimony says that you performed a stratified sample of these offices.

a. Please describe the number of strata.

b. Provide the number of offices in each and tell how many offices were sampled in each stratum.

c. Please describe the sampling plan.

d. Please explain whether you don't know the standard deviation because you have not calculated it or whether you don't know it because it is not possible to calculate. If the latter, please explain why.

e. Please show how you developed the estimate of 141,185 (000) pieces you provided in part b of your response, including all assumptions, data and computations and provide the spreadsheet used to perform the calculations.

17. Please refer to your response to NNA/USPS T1-8 and 9. Of the 141,185 (000) pieces of within county mail where the bulk mail function has not been automated, how many are from offices that comprise the "other strata based on their second class revenues" and how many are from the offices comprising the intensive strata. Please provide the standard deviation of each estimate. If you cannot do so, please explain why.