

DOCKET SECTION

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

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Postal Rate and Fee Changes, 1997

Docket No. 197-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
THE UNITED STATES POSTAL SERVICE (NAA/USPS-18-20)  
September 26, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to the United States Postal Service and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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By:

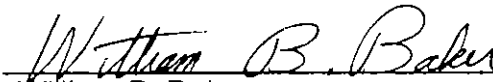


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**CERTIFICATE OF SERVICE**

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 26, 1997

  
William B. Baker

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NAA/USPS-18. Please refer to the answer NAA/USPS-T36-31(a), which was redirected to the Postal Service. That question had asked:

“Please refer to pages 1 and 2 of Library Reference H-186. If you cannot answer, please refer to someone who can.

- a. Please explain why there are letters that exceed 3.3 ounces.
- b. Please explain how a sixteen-ounce piece can have the dimensions of a letter.”

The response states that it “is assumed” that the question referred to Library Reference H-182. Although that assumption was understandable under the circumstances, because the interrogatory followed a series of questions relating to LR-H-182, NAA really did mean to refer to LR-H-**186**. Accordingly, please answer the question as originally posed, with respect to LR-H-186.

NAA/USPS-19. Please refer to LR H-109.

- a. Please explain the specific source (page number and column number of LR H-106) for the figures contained in Column (6), page 4 of LR H-109.
- b. Please provide the specific source (page number and column number of LR H-106) for the figures contained in Column (6), page 5 of LR H-109.
- c. Please identify the difference between the variable mail processing costs in Column (6) and the total direct tally IOCS costs in Column (3). What costs are included in Column (6) that are not included in Column (3)? Please explain fully.
- d. Please explain all reasons why the difference between the variable mail processing costs in Column (6) and the total direct tally IOCS costs in Column (3) are distributed to “WS” and “non-WS” mail in proportion to the direct tally IOCS costs.

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NAA/USPS-20. Please refer to the document referenced in a September 8, 1997, Postal Service press release entitled "Finding Common Ground" prepared by a "Blue Ribbon Committee" of "top corporate executives.

- a. How were the eight "mail industry leaders" that comprised of the "Blue Ribbon Committee" selected?
- b. Please explain why the Blue Ribbon Committee did not consist of a representative body of large, medium and small mailers.
- c. How much did the physical production of the report cost the Postal Service?
- d. Did the Postal Service contribute staffing and time in support of the Blue Ribbon Committee's efforts?
- e. Approximately what percentage of the total costs of the Blue Ribbon Committee's efforts were funded by the Postal Service?
- f. Into what postal cost accounts would the time and costs incurred by the Postal Service related to the Blue Ribbon Committee's efforts be recorded?
- g. How are the postal cost accounts identified in subpart (f) attributed?