

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PAFFORD TO INTERROGATORY OF
THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T1-1)

The United States Postal Service hereby provides the response of witness Pafford to the following interrogatory of the Newspaper Association of America: NAA/USPS-T1-1, filed on September 15, 1997.

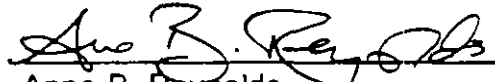
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
September 29, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD
TO INTERROGATORY OF THE NEWSPAPER ASSOCIATION OF AMERICA

NAA/USPS-T1-1. Please refer to page 3, lines 9-11 of your testimony.

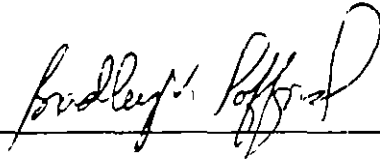
- a. Please provide the basis for your state that there is a "statutory requirement" that each class of mail be priced so as to cover its volume variable costs, as opposed to any other measure of costs.
- b. Have you consulted the testimony of witnesses Panzar or Takis to determine whether they agree with your statement?
- c. Please describe your qualifications to express an opinion as to how the term "attributable" in section 3622(b)(3) of the Postal Reorganization Act should be interpreted.

RESPONSE:

- a. Please see the revision to my testimony, filed on September 29, 1997.
- b. N/A
- c. N/A

DECLARATION


I, Bradley V. Pafford, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 9-29-97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

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September 29, 1997