

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 TO INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA (NAA/USPS-16-17)

The United States Postal Service hereby provides responses to the following interrogatories of the Newspaper Association of America: NAA/USPS-16-17, filed on September 17, 1997.

Each 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


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October 1, 1997

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NAA/USPS-16. Please refer to the answer NAA/USPS-13(c) and (d), which did not confirm that the Postal Service has developed data showing the extent of on-time performance on a facility and market basis, respectively. Please also refer to a press release issued by the United States Postal Service on June 25, 1997, entitled "U.S. Postal Service Makes The 'Honor Roll' In Local Mail Service; Set New Record For On-Time Delivery."

- a. Please confirm that the press release states, in part, that the cities of Omaha and Seattle received the best local mail service in the nation during the period covered by the release.
- b. Please confirm that, according to the press release, nine other cities received on time delivery of 95 percent of overnight First Class Mail during the period covered by the release.
- c. Please confirm that the press release reports on the delivery performance of overnight First Class Mail received by a number of other cities during the period covered by the release.
- d. Please confirm that the data reported by the press release constitute a measure of the extent of on-time performance on a market basis. If you cannot confirm, please explain why not.
- e. Please confirm that the press release reports on the delivery performance of overnight First Class Mail received by "Northern Virginia" during the period covered by the release.
- f. Please confirm that the reference to "Northern Virginia" in the press release is a reference to First Class Mail processed at the U.S. Postal Service facility in Merrifield, Virginia. If you cannot confirm, please indicate what facilities are meant by "Northern Virginia."
- g. Please confirm the data reported by the press release regarding Northern Virginia constitute a measure of the extent of on-time performance on a facility basis. If you cannot confirm, please explain why not.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. Not confirmed. The press release referred to in the interrogatory reports scores from the EXFC Measurement System. This system measures service performance for first-class Mail for 96 locations. These locations correspond to cities, with the exception of Northern Virginia, Suburban Maryland, and South Suburban, IL, which are treated as "cities" for the purposes of EXFC.

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- e. Confirmed.
- f. Not confirmed. The EXFC score reported for Northern Virginia is not tied to any specific facilities, but refers to the 3-digit ZIP Codes that constitute the Northern Virginia "EXFC city." These ZIP Codes are 201, 220, 221, 222, and 223.
- g. Not confirmed. Please see response to subpart (f), above.

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NAA/USPS-17 Please refer to the answer to NAA/USPS-2(b), which indicates that as a "general rule, Areas and other field organizations do not have advertising."

- a. Do any "Area" or "other field organizations" have advertising budgets as an exception to the "general rule"?
- b. How many "Areas" of "other field organizations" have advertising budgets as an exception to the general rule?

RESPONSE:

- a & b. No advertising funds were allocated to the field in FY 1997;
however, two areas re-allocated small amounts to the advertising
budget line for local advertising initiatives totaling \$190,510.

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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