

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

**Postal Rate and Fee
Changes, 2005**

)
)

Docket No. R2005-1

**Interrogatories of National Newspaper Association (NNA)
to United States Postal Service Witness Bradley Pafford,
NNA/USPS T4-1-7
(May 4, 2005)**

Pursuant to sections 25 and 26 of the Rules of Practice, National Newspaper Association hereby directs interrogatories to United States Postal Service Witness Bradley Pafford. If any interrogatory cannot be answered by the witness, NNA requests that it be directed to a witness who can provide a response.

NNA/USPS T4-1

Please confirm that the total annual volumes for In County mail reported in the Fiscal Year 2004 Revenue Piece Weight report appended to your testimony are derived in part from a census of post offices using Postal One and in part from the supplemental probability sample of non-Postal One offices mentioned in your testimony at page 9. If you do not confirm, please explain how the volumes were derived.

NNA/USPS T4-2

Did the Postal One system completely replace the PERMIT system used in automated offices in earlier years to collect volume data? If your answer is no, please explain.

NNA/USPS T4-3

Please explain any changes in sampling, sampling design, billing determinant measurement, computerization of post offices or measurement methodology instituted by the Postal Service that would have changed the way In County volumes were measured between the base year in R2000-1 and Fiscal Year 2004.

NNA/USPS T4-4

Please provide a breakdown of the percentage of In County volumes derived from Postal One offices and supplemental probability study offices.

NNA/USPS T4-5

With regard to the supplemental probability study offices, please provide:

- a. The total number of offices in the population
- b. The total number of strata in the sample
- c. The total number offices from which you received data for the panel.
- d. The total number of pieces reported from this panel in 2004
The blow up factor you used to derive the total volume from this panel
- e. The frequency with which offices in the panel reported data for the RPW report and whether that frequency is greater or lesser than the frequency used in previous years.

NNA/USPS T4-6

Is it necessary to reconcile the data reported from any combined volume and revenue results from the Postal One and supplemental sample with the results from the accounting code? If so, please explain the amount of adjustment required to finalize the RPW report?

NNA/USPS T4-7

Do you anticipate that Postal One will be introduced into all nonautomated offices and thereby eliminate the need for a supplemental panel within the foreseeable future?

Respectfully submitted,

Tonda F. Rush
King & Ballow
Counsel to National Newspaper
Association
PO Box 50301
Arlington, VA 22205
(703) 812 8989
Newsbizlaw@aol.com

May 4, 2005