

DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PAFFORD TO INTERROGATORIES OF  
THE NATIONAL NEWSPAPER ASSOCIATION  
(NNA/USPS-T1-15-17)

The United States Postal Service hereby provides responses of witness Pafford to the following interrogatories of the National Newspaper Association: NNA/USPS-T1-15-17, filed on September 24, 1997.

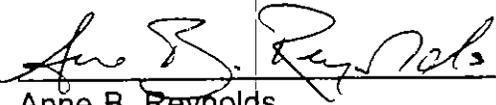
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

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October 9, 1997

ANSWERS OF BRADLEY V. PAFFORD  
TO INTERROGATORIES OF THE NNA

NNA/USPS-T1-15. 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.

NNA/USPS-T1-15. The interrogatory subpart referred to asked that I confirm that Table 2, page 11 of my testimony, shows an estimate of 877,829 (000) pieces for within county mail in FY 1996. It did not ask to provide the coefficient of variation (C.V.). The C.V. is not computed since it is not clear how the set of sample offices used for the base year PQ I - III period were originally selected prior to FY 1989.

ANSWERS OF BRADLEY V. PAFFORD  
TO INTERROGATORIES OF THE NNA

NNA/USPS-T1-16. 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 later, 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.

NNA/USPS-T1-16. Response.

- a. Ten nonautomated office strata were used for the PQ I through III, FY 1996 period. Six nonautomated office strata were used for the PQ IV, FY 1996 period.
- b. The following provides the population and sample counts for the strata listed in part a:

FY 1996 PERIODICALS NONAUTOMATED OFFICE PANEL

Period (PQ)	Stratum Number	Population Size	Sample Size
I-III	1	34	2
	2	191	8
	3	148	5
	4	162	6
	5	*	5
	6	*	6
	7	*	6
	8	*	15
	9	*	6
	10	*	3
IV	1	94	5
	2	403	4
	3	979	4
	4	1784	4
	5	2642	4
	6	201	4

\* See response to NNA/USPS T1-15.

- c. For each period, a panel of offices was chosen from a frame using probability proportional to size or random selection methods. For PQ IV, a frame listing of nonautomated offices reporting periodicals activity was partitioned into two categories: classroom/nonprofit and within county/residual. The latter population was further stratified on within county revenue and offices randomly selected.
- d. Please see response to NNA/USPS T1-15.
- e. The estimate of pieces requested in NNA/USPS T1-8, part c, is a domain estimate. The SAS programming code along with the domain estimates are provided in the attachment. Input data is not provided since it contains facility specific and proprietary information. See LR-H-38. No additional assumptions are made for the domain estimate beyond those provided in my direct testimony.





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=====  
141184615  
736644098

OBS ENTRY VOL  
1 AUTO  
2 NAUTO

FY96 PUBLISHERS IN-COUNTY  
NNA/USPS-T1-8: AUTO VS. NONAUTO COUNTS

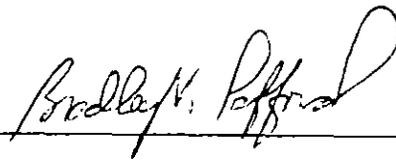
ANSWERS OF BRADLEY V. PAFFORD  
TO INTERROGATORIES OF THE NNA

NNA/USPS-T1-17. 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.

NNA/USPS-T1-17. There are an estimated 4,557 (000) pieces corresponding to nonautomated offices that comprise the "other strata based on their second class revenues." There are an estimated 136,628 (000) pieces corresponding to nonautomated offices that comprise the within county intensive strata. Please see the response to NNA/USPS T1-15 relating to providing the standard deviation of the estimate.

**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: 10-9-97

**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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