

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20068-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION TO POSTAL SERVICE WITNESS PAFFORD, USPS-T-3
(NNA/USPS-T3-11-24)

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service Bradley Pafford and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

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NNA/USPS-T3-11 On page 1 of USPS-LR-L-17, the Postal Service states that the BRPW System utilizes “a non-automated office segment from which postage statement information is obtained from a probability-based sample of these offices.” With respect to this statement please explain what distinguishes an automated from a non-automated office segment and provide counts of all automated and non-automated office segments in the universe of BRPW facilities grouped by type and by size category for FY 2005.

NNA/USPS-T3-12 On page 1 of USPS-LR-L-17, the Postal Service states that the BRPW System utilizes “a probability-based sample” of non-automated office segments. Please define the term “probability-based sample,” explain fully how this sample was selected and provide all data supporting each specific probability that was measured or considered in selecting this sample.

NNA/USPS-T3-13 On page 1 of USPS-LR-L-17, the Postal Service states that the BRPW System utilizes “a probability-based sample” of non-automated office segments. With respect to this statement please provide any analyses or calculations that demonstrate that the USPS’ “probability-based sample” was randomly selected.

NNA/USPS-T3-14 On page 1 of USPS-LR-L-17, the Postal Service states that the BRPW System utilizes “a probability-based sample” of non-automated office segments. With respect to this statement please provide any analyses or calculations that demonstrate that the USPS’ “probability-based sample” was not biased.

NNA/USPS-T3-15 On page 2 of USPS-LR-L-17, the Postal Service provided Table 1. With respect to Table 1, please define each stratum shown for Periodicals (i.e. 2.1, 2.2, 2.3, 2.4 and 2.5) and explain fully how the USPS selected the dividing lines between each stratum that is shown for Periodicals in Table 1.

NNA/USPS-T3-16 On page 2 of USPS-LR-L-17, the Postal Service provided Table 1. With respect to Table 1, please explain fully whether the strata shown for Periodicals (i.e. 2.1, 2.2, 2.3, 2.4 and 2.5) are defined on the basis of revenue (or other measure of volume) for all Periodicals, for all Outside County Periodicals, for all Within County Periodicals or for each Periodical subclass separately. If the strata are defined separately for each Periodical subclass, please confirm that the USPS used the same sample of non-automated office segments for each different subclass of Periodicals that it analyzed. Explain any answer other than a confirmation.

NNA/USPS-T3-17 On page 2 of USPS-LR-L-17, the Postal Service provided Table 1. With respect to Table 1, please provide the minimum and maximum Within County revenue levels that were used to group office segments in each stratum (i.e. 2.1, 2.2, 2.3, 2.4 and 2.5).

NNA/USPS-T3-18 On page 2 of USPS-LR-L-17, the Postal Service states, “The probability-based sample of the non-automated office segment was last updated at the beginning of FY2004.” With respect to this statement, please explain fully for the Periodicals sample what exactly was “last updated at the beginning of FY 2004” and what was not.

NNA/USPS-T3-19 On page 2 of USPS-LR-L-17, the Postal Service states, “Table 1 provided the updated population and sample sizes used in FY 2005.” With respect to this statement, please provide, for the Periodicals samples, populations and sample sizes based on data for FY 2004 and for FY 2005. Explain fully which of these data were used in the analyses in this case.

NNA/USPS-T3-20 Refer to Table 1 in USPS-T-3. Provide, in the same format and for each of the same categories of mail shown in Table 1 that part of the revenue, piece and weight estimates derived solely from the ODIS-RPW system.

NNA/USPS-T3-21 Refer to Table 1 in USPS-T-3. Provide, in the same format and for each of the same categories of mail shown in Table 1 that part of the revenue, piece and weight estimates derived solely from the BRPW system.

NNA/USPS-T3-22 Refer to Table 1 in USPS-T-3. Provide, in the same format and for each of the same categories of mail shown in Table 1 that part of the revenue, piece and weight estimates derived solely from the automated office segment of the BRPW system as described on page 1 of USPS-LR-17/R2006-1.

NNA/USPS-T3-23 Refer to Table 1 in USPS-T-3. Provide, in the same format and for each of the same categories of mail shown in Table 1 that part of the revenue, piece and weight estimates derived solely from the “bulk mail acceptance and financial reporting system maintained by the Postal Service’s Marketing group” that is part of the BRPW system as described on page 1 of USPS-LR-17/R2006-1.

NNA/USPS-T3-24 Refer to Table 1 in USPS-T-3. Provide, in the same format and for each of the same categories of mail shown in Table 1 that part of the revenue, piece and weight estimates derived solely from the non-automated office segment of the BRPW system as described on page 1 of USPS-LR-17/R2006-1.