

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

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

THIRD SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION TO POSTAL SERVICE WITNESS PAFFORD, USPS-T-3
(NNA/USPS-T3-25-28)

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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July 12, 2006

NNA/USPS-T3-25 Please provide the revenue, piece and weight data for Within County Mail produced by the BRPW on a per-quarter basis for the Base Year.

NNA/USPS-T3-26 Please confirm that in R2000-1 and R97-1, the Commission adjusted volume figures projected for the test year for the Within County subclass to use a multi-year average on the basis of data produced by BRPW. If you do not confirm, please fully explain your response.

NNA/USPS T3-27 Please provide for the base years used in dockets R2000-1 and R97-1 the percentage of reported volume derived from the probability-based sample? From the census-based system, e.g. Postal One?

NNA/USPS T3-28 With respect to your response to NNA/USPS T3-1 for Within County subclass:

- a) Why did you choose to calculate CVs?
- b) Do you believe CVs have value in understanding the revenue, piece and weight data with respect to this subclass?
- c) Why did you choose 95% as an acceptable variation?