

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 BOZZO, USPS T46
(NNA/USPS-T46-18-28)

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service A. Thomas Bozzo 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 13, 2006

NNA/USPS-T46-18 Please refer to your response to NNA/USPS-T46-1. With respect to this answer please confirm that since Within County Periodicals were not studied separately from Outside County Periodicals in the beta test, that you are not able to calculate a percentage “shift” for Within County Periodicals that would be comparable to the percentage shifts for other subclasses that appear in your Table 1. Please explain fully any answer other than a confirmation.

NNA/USPS-T46-19 With respect to your response to NNA/USPS-T46-7, you indicate that in the redesigned IOCS, data collectors record that a piece has no indicia in Q23E2 and then record an answer to the “subsequent” question Q23E6, which asks “Is the mailpiece a Periodical, for example a regularly published magazine, newspaper or newsletter?” With respect to Q23E6, please confirm that in the redesigned IOCS for Base Year 2005, the Postal Service recorded 7,541 “Y” tallies in response to this “Periodicals Check” question Q23E6 and that 377 of these 7,541 tallies were later determined not to be Periodicals at all. Please explain fully any answer other than a confirmation.

NNA/USPS-T46-20 With respect to the table provided in your response to NNA/USPS-T46-8, you indicate that the tally counts provided are “consistent with USPS-T-46, Table 7.” With respect to this statement, please provide underlying calculations showing how each tally count provided in your responses to NNA/USPS-T46-8 (and to NNA/USPS-T46-21 below) is weighted and otherwise adjusted to produce the tally dollar weights for Periodicals that are reported in your Table 7.

NNA/USPS-T46-21 With respect to the table provided in your response to NNA/USPS-T46-8, please provide a comparable count of actual tallies by category for BY 2005.

NNA/USPS-T46-22 With respect to your response to NNA/USPS-T46-9, you provided several lists of publications where the USPS classified tallies as being eligible for Within County rates. With respect to the following six titles that appeared on those lists, please state fully and completely the bases relied on by the USPS to conclude, during the course of this study, that the individual mail pieces in question had been eligible for Within County rates:

- a) Memphis Business Journal,
- b) Value Line Daily Options Survey,
- c) Houston Chronicle,
- d) Japanese Daily Sun,
- e) Post Telegraph,
- f) Star Herald.

NNA/USPS-T46-23 With respect to your response to NNA/USPS-T46-9, you provided several lists of publications where the USPS classified tallies as

mailpieces that were eligible for Within County rates. With respect to the individual mailpieces that were classified as being eligible for Within County rates for each publication listed in this response, please provide the publication volume number and the publication issue date for the mailpiece for which a tally was recorded during the course of the study.

NNA/USPS-T46-24 With respect to your response to NNA/USPS-T46-9, you provided several lists of publications where the USPS classified tallies as mailpieces that were eligible for Within County rates. With respect to each publication listed in this response, please provide the exact paid circulation recorded by the USPS for the publication during the course of this study and the effective date of that paid circulation count.

NNA/USPS-T46-25 With respect to your response to NNA/USPS-T46-9, you provided several lists of publications where the USPS classified tallies as recording mailpieces that were eligible for Within County rates. With respect to each publication listed in this response, please identify each publication where the USPS had concluded during the course of this study that paid circulation was 10,000 or more.

NNA/USPS-T46-26 With respect to your response to NNA/USPS-T46-9, you provided several lists of publications where the USPS classified tallies as recording mailpieces that were eligible for Within County rates. With respect to each publication listed in this response, where the USPS believed that paid circulation was 10,000 or more, please describe fully how, during the course of this study, the USPS verified that more than half of the total paid circulation for the publication was in fact distributed within the same county as the Post Office of original entry.

NNA/USPS-T46-27 With respect to your response to NNA/USPS-T46-13, you indicate that “the results of the IOCS testing showed no examples of pieces of other subclasses misidentified as Periodicals,” With respect to this statement, please explain why the “IOCS testing” to which you refer did not reveal that in the redesigned IOCS, the responses to Q 23E6 (“Is the mailpiece a Periodical, for example a regularly published magazine, newspaper or newsletter?”) misidentified 377 tallies as Periodicals which were later determined not to be Periodicals at all. Explain your answer fully.

NNA/USPS-T46-28 With respect to your response to NNA/USPS-T46-15, you state, “That is, if the mailing statements indicate pieces entered at Within-County rates, the publication’s eligibility is assumed to have been determined in the course of approving the publication for mailing at Periodicals rates.” With respect to this statement please indicate whether, during the course of this study, the Postal Service listed or catalogued in any way, the dates upon which the eligibility of individual publications for Within County rates had been authorized. If

the Postal Service prepared such lists during the course of this study please make all such lists available.