

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BOZZO
(USPS-T-46) TO INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION (NNA/USPS-T46-18, 20-28)
(July 27, 2006)**

The United States Postal Service hereby provides the responses of witness Bozzo (USPS-T-46) to the above referenced interrogatories, filed on July 13, 2006. Interrogatory NNA/USPS-T46-19 was redirected to witness Czigler, USPS-T-1.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 27, 2006

Response of United States Postal Service Witness A. Thomas Bozzo
(USPS-T-46) To Interrogatories of the National Newspaper Association

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.

Response.

Partly confirmed. It is technically possible to subject the beta test tallies to the same editing procedures employed to identify Within-County Periodicals in the production data. However, as I noted in the NNA/USPS-T46-1 response, the expected result would be insufficient observations of Within-County Periodicals to support statistical inferences.

Response of United States Postal Service Witness A. Thomas Bozzo
(USPS-T-46) To Interrogatories of the National Newspaper Association

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.

Response.

The weighted tallies are sums of the dollar weights in IOCS field F9250 for the specified categories.

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

Please see the table below.

Category	BY 2005	
	Tally Ct	% of Total
In-County in FY03 lookup table	14	14%
In-County in FY04 lookup table	40	40%
In-County not in either lookup table	47	47%
Total In-County	101	100%
Outside County in FY03 lookup table	2,900	56%
Outside County in FY04 lookup table	1,936	37%
Outside County not in either lookup table	328	6%
Total Outside County	5,164	100%
Total Periodicals in FY03 lookup table	2,914	55%
Total Periodicals in FY04 lookup table	1,976	38%
Total Periodicals not in either lookup table	375	7%
Total Periodicals	5,265	100%

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

For all of the listed titles, the destination of the piece recorded in the tally was determined to be in the same county as the office of entry. In addition:

- a.-d. The Postal Service concluded that these titles were eligible for Within-County Periodicals rates on the basis of mailing statement data indicating that pieces were entered at Within-County rates for the titles.
- e. The Postal Service determined that this title had circulation under 10,000 copies.
- f. The Postal Service concluded that this title was eligible for Within-County Periodicals rates on the basis of mailing statement data indicating pieces entered at Within-County rates for the title.

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

The volume number and issue date are not recorded in IOCS, so the requested data are unavailable.

Response of United States Postal Service Witness A. Thomas Bozzo
(USPS-T-46) To Interrogatories of the National Newspaper Association

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.

Response.

Circulation data was not collected for the majority of tallies classified on the basis of mailing statement data. Titles for which circulation counts were collected, the circulation count, and the edited activity code are listed in the table below. An exact date of the circulations cannot be determined, but the most recent editions (2005) of the publication directories cited in USPS-LR-L-9 were used to determine circulation.

<u>Title</u>	<u>Circulation</u>	<u>Actv Code</u>
ONE VOICE	circ 19,500 weekly religious newspaper	2212
GONZALES TRIBUNE	circ 13,000 weekly community newspaper	2211
CLYDE REPUBLICAN	circ 1,000 weekly community newspaper	2211
SOUTHWEST DAILY TIMES	circ 7,157 weekly community newspaper	2211
SMITHVILLE LAKE HERALD (THE)	circ 2,675 weekly community newspaper	2211
THE JEWISH WEEK	circ 90,000 weekly religious newspaper	2212
SAVOY	circ 325,000	2212
BURNS TIME HAROLD	circ 3,000 weekly community newspaper	2211
CHERAW CHRONICLE	circ 8,050 weekly community newspaper	2211
GAZETTE	circ 8,800 3-times/week community newspaper	2211
THE NEW LONDON JOURNAL	circ 1,092 weekly community newspaper	2211
LAKE CITY GRAPHIC	circ 3,200 weekly community newspaper	2211

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Title	Circulation	Actv Code
DODGE CRITERION	circ 1,100 weekly community newspaper	2211
ARKANSAS BANKER	circ 2,000 monthly	2211
DRAIN ENTERPRISE	circ 1,300 weekly community newspaper	2211
LICKING NEWS	circ 2,500 weekly community newspaper	2211
TRI COUNTY NEWS	circ 1,400 weekly community newspaper	2211
RICHLAND OBSERVER	circ 4,000 weekly community newspaper	2211
CALAVERAS ENTERPRISES	circ 5,300 semi-weekly community newspaper	2211
POST TELEGRAPH	circ 2,670 semi-weekly community newspaper	2211
THE ALAMANCE NEWS	circ 6,065 weekly community newspaper	2211
TONGANOXIE MIRROR	circ 2,500 weekly community newspaper	2211
FORT BRAGG ADVOCATE-NEWS	circ 5,400 semi-weekly community newspaper	2211
GEORGETOWN MAGAZINE	circ 140,000 quarterly publication	2212
GEORGIA BULLETIN (THE)	circ 77,000 weekly religious publication	2212
THE AMERICAN LEGION MAGAZINE	circ 2,602,005	2212
KENTUCKY LIVING	circ 479,791 monthly state publication	2212
WESTERN RECORDER	circ 49,620 weekly religious publication	2212
TULANE UNIVERSITY - Tulanian	circ 83,000 alumni quarterly publication	2212
CATHOLIC TELEGRAPH	circ 24,500 weekly religious publication	2212
DRAIN ENTERPRISE	circ 1,300 weekly community newspaper	2211
WEST TENNESSEE CATHOLIC	circ 17,000 weekly religious publication	2212
NORTH TEXAS CATHOLIC	circ 27,200 bi-monthly religious publication	2212
TODAY'S CATHOLIC	circ 24,000 bi-weekly religious publication	2212
TIMES JOURNAL - Chilton Times Journal	circ 5,400 weekly community newspaper	2211

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

Please see the response to NNA/USPS-T46-24.

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

Please see the response to NNA/USPS-T46-24. The Gonzales Tribune is the only such title; the classification was based on the assumed local appeal of a community newspaper.

Response of United States Postal Service Witness A. Thomas Bozzo
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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 Q23E6 (“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.

Response.

The data upon which my statement is based were subject to the edit checks to which Dr. Czigler refers in the response to NNA/USPS-T1-20. Thus, my statement in the response to NNA/USPS-T46-13 is made with respect to the combination of data collection and coding/editing procedures.

Response of United States Postal Service Witness A. Thomas Bozzo
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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.

Response.

The Postal Service did not collect dates of eligibility for individual titles.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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