

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK
(USPS/NNA-T3-20-22)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to National Newspaper Association witness Siwek: USPS/NNA-T3-20-22.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 3, 2006

SECOND SET OF INTERROGATORIES FROM
THE UNITED STATES POSTAL SERVICE TO NATIONAL NEWSPAPER
ASSOCIATION WITNESS SIWEK

USPS/NNA-T3-20. On page 4 of your testimony, lines 4-6, you claim that apparent cost increases for Within County “far more likely ... result from .. deficiencies” in Postal Service “processes and data used... [for] the Within County Periodical [sic] subclass.” Please refer to library references R2005-1/LR-K-9, Appendix D and R2006-1/LR-L-9, Appendix D.

- a. Are you claiming that between BY2004 and BY2005 the Postal Service changed any of the processes specifically applicable to Within-County Periodicals, as opposed to general IOCS changes affecting all Periodicals?
- b. If your answer to part (a) is affirmative, please explain in detail what changes you believe were made, and please provide citations to USPS-LR-K-9, Appendix D, and USPS-LR-L-9, Appendix D, to support your claims.
- c. If your answer to part (a) is negative, please explain how you believe processes that did not change between BY 2004 and BY 2005 can account for the measured cost increase.

USPS/NNA-T3-21. Please refer to your response to USPS/NNA-T3-9(a), which asks for your understanding of a number of tallies rather than a description of how circulation information is used to assign subclass. How many of the 193 direct tallies were assigned to the Within-County Periodicals subclass based on circulation figures obtained from publication directories?

USPS/NNA-T3-22. Please refer to your response to USPS/NNA-T3-12(a), which asks for your understanding of a number of tallies rather than a description of how historical data is used to assign subclass. How many of the 193 direct tallies were assigned to the Within-County Periodicals subclass based on prior years' identifications?