

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

**Postal Rate and Fee Changes, 2006**

)

**Docket No. R2006-1**

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

NNA hereby provides responses to interrogatories of the United States Postal Service, USPS/NNA T3-20-22. Each interrogatory is repeated verbatim and a response follows.

Respectfully submitted,

Tonda F. Rush  
Counsel for  
NATIONAL NEWSPAPER ASSOCIATION,  
INC

King & Ballou  
PO Box 50301  
Arlington, VA 22205  
(703) 812-8989; (703) 812-4555 fax  
[trush@americanpressworks.com](mailto:trush@americanpressworks.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have filed the foregoing document online in accordance with the Commission's Rules of Practice.

---

Tonda F. Rush  
Counsel for National Newspaper Association,  
Inc.

October 17, 2006  
Arlington, VA 22206

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK TO  
INTERROGATORIES OF UNITED STATES POSTAL SERVICE

**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.

**RESPONSE:**

- a. No. I have not tried to distinguish changes in the IOCS processes that were “specifically applicable” to Within-County Periodicals from “general IOCS changes” affecting all Periodicals.
  
- b. See my response to (a) above.
  
- c. The processes that affected all Periodicals did change and those changes appear to have contributed to the dramatic cost increases for the Within County subclass that are claimed by the Postal Service in this case. For one example of how these changes might have affected the Within County subclass, I note that at lines 7-8 of page 35 of Mr. Bozzo’s Direct Testimony (USPS-T-46), Mr. Bozzo states “The Within-County increase appears to have resulted from new methods to facilitate identification of Periodicals in the redesigned Question 23.”

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK TO  
INTERROGATORIES OF UNITED STATES POSTAL SERVICE

**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?

**RESPONSE:**

In his response to NNA/USPS-T46-24, USPS witness Bozzo stated that “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.” By my count, the list provided in this response included 35 different publications whose circulations were determined on the basis of the publication directories cited in USPS-LR-L-9. Of this total, there were 22 publications that were ultimately given an edited 2211 (Within County) activity code and 13 publications that were ultimately given an edited 2212 (Outside County) activity code.

I believe that the USPS did not use the circulations reported above as the sole basis upon which to assign each of the publications to a Periodical subclass. For example, in the response cited above, the USPS collected circulation data for the *Gonzales Tribune* from the publications directories that it listed in USPS-LR-L-9. The reported circulation for the *Gonzales Tribune* was 13,000. While this total exceeds the 10,000 circulation threshold for Within County publications, it is certainly far below, say 200,000. Nevertheless, in his response to NNA/USPS-T46-26, Mr. Bozzo stated that the *Gonzales Tribune* was classified as a Within County publication “based on the assumed local appeal of a community newspaper.” (Emphasis Added). In this circumstance are we therefore to assume that the circulation data that the USPS compiled on this publication had nothing to do with the USPS’ assumption that the publication had local appeal? Suppose the circulation of the *Gonzales Tribune* were 200,000. In that circumstance, would the USPS still assume that the publication had local appeal?

Given the sequential nature of the USPS tally editing process and the data that I have reviewed, I cannot report how many of the 193 direct tallies that were ultimately

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK TO  
INTERROGATORIES OF UNITED STATES POSTAL SERVICE

assigned to the Within County subclass were assigned there “based on” the publication directory circulation figures or for another reason or perhaps for more than one reason.

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION WITNESS SIWEK TO  
INTERROGATORIES OF UNITED STATES POSTAL SERVICE

**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?

**RESPONSE:**

Based on the data that I have reviewed, I cannot report how many of the 193 direct tallies that were ultimately assigned to the Within County subclass were assumed to be eligible to mail at Within-County Periodicals rates "based on" whether the publication had been mailed at Within-County Periodicals rates at least once in the previous two years.