

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE NATIONAL NEWSPAPER ASSOCIATION WITNESS HEATH
(USPS/NNA-T1-1-49)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the National Newspaper Association witness Heath: USPS/NNA-T1-1-49.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
January 22, 1998

USPS/NNA-T1-1. What is your background in the field of statistics? Please specify any training or courses you have completed in this area.

USPS/NNA-T1-2. At page 2, lines 18-19 of your testimony, you state that NNA has a "membership of nearly 4,000 titles." What is NNA's membership in terms of number of publishers?

USPS/NNA-T1-3. How do you define a "typical NNA member newspaper," as you use the phrase on page 3, line 2-3, of your testimony, given the wide variety in your membership's publication characteristics?

- a. How many of your member publications fit within your definition of the "typical NNA member newspaper"?
- b. Please provide all calculations and assumptions used in producing the number you provided in subpart a.

USPS/NNA-T1-4. At page 4, lines 3-4, of your testimony, you state that daily newspapers rely upon the Postal Service's Periodicals delivery for "subscribers in outer markets or in distant cities."

- a. Please define the terms "outer markets" and "distant cities" as you use them in this portion of your testimony.
- b. For the base year in this proceeding, please provide an estimate of the daily newspaper volume sent to "outer markets" and "distant cities," as you define these areas in part a.

- c. For the base year in this proceeding, please provide an estimate of the daily newspaper volume sent to “outer markets” and “distant cities” that is sent as Periodicals class.
- d. For the base year in this proceeding, please explain how you derive the estimated volumes you provide in subparts a. and b., and provide associated formulas.
- e. For the base year in this proceeding, please provide a plus/minus 1 estimated standard error of the estimated proportion of the volume figure you provide in subpart c. to the volume figure you provide in subpart b.
- f. If you cannot provide a response to any of the above subparts, please explain why you cannot.

USPS/NNA-T1-5. At page 4, lines 9-10 of your testimony, you state that “weekly newspapers remain heavy users of mail delivery.” For the base year:

- a. Please provide estimates of total weekly newspaper volume and of the total weekly newspaper volume traveling through the mail (i.e., delivered by the USPS), that you feel support this statement.
- b. Explain how the estimated volumes in part a. were derived, and provide all associated formulas.
- c. Please provide a plus/minus 1 estimated standard error of the estimated proportion that would result from dividing the weekly volume of newspapers traveling through the mail (calculated in part a., above)

by the total weekly newspaper volume (also provided in part a., above).

- d. If you cannot provide a response to any of the subparts in this question, please explain why not.

USPS/NNA-T1-6. Please refer to the mail user's survey that you discuss in your testimony beginning at page 11.

- a. Please provide a copy of the survey forms sent to each NNA member. If more than one form was used, please provide a copy of each type of form.
- b. Please provide copies of any survey instructions given to the respondents, or a summary of any instructions given orally.
- c. Your testimony states, at page 11, line 8, that survey responses were sent to NNA's headquarters and your office. Were certain respondents instructed to respond to each location, or were they given the choice of where to respond? Please explain your response.
- d. *What studies were conducted to support your statement that the non-respondent group to the 1995 study were representative of the respondent group with respect to the percentage of copies that were within county circulation? Please provide the results of any such studies and all supporting documentation.*
- e. Please fully describe and provide the surveys similar to the one you discuss beginning at page 11 of your testimony, that NNA has

conducted or relied upon in the past. If you cannot provide such information, please explain fully why you cannot.

NNA/USPS-T1-7. You state, at page 11, line 13 of your testimony, that the “[c]irculations represented by these respondents totaled about 7.2 million copies.” Does this 7.2 million figure represent an average calculated at some point in 1995, the total number of copies for the 1995 calendar year, or some other number? Please explain fully. If this figure represents a circulation number at a particular point in time, please specify the time period.

NNA/USPS-T1-8. Your testimony, at page 11, line 15, states that “22 percent of the total was within county circulation.”

- a. Of these 22 percent, how many of these publications’ copies were actually delivered by the Postal Service?
- b. Please provide similar statistics for the past five years, or explain fully why you cannot.

NNA/USPS-T1-9. Throughout your testimony, you refer to the numbers of copies of publications. Do you use the term “copies” as synonymous with the term “pieces”? If your response is other than an unqualified yes, please explain fully.

NNA/USPS-T1-10. At page 12, lines 17-20 of your testimony, you describe the derivation of total circulation data of NNA members.

- a. Please specify the time period indicated by term, "the early years," at page 12, line 17.
- b. How often are the circulation figures for non-members' newspapers added, as described at lines 19-20?
- c. How often are your members' circulation figures updated?
- d. Please describe fully what you mean by "footnoting" your data, as you use the term at page 13, line 4 of your testimony.

NNA/USPS-T1-11. Please describe fully the adjustments that you make to your data for the usage of within county mail "by any substantial numbers of city business publications, newsletters, city magazines and so forth," as you discuss at page 13, lines 10-12 of your testimony.

NNA/USPS-T1-12. At page 15, line 13 of your testimony, you describe "the Postal Service's determination not to release data it considers identifiable by mailers."

- a. Please indicate where, on the record of this proceeding, NNA has sought such information.
- b. Please indicate where, on the record of this proceeding, the Postal Service has denied to NNA volume information for within county mail.

NNA/USPS-T1-13. Please refer to Exhibit 3 of your testimony.

- a. Please fully describe the sources and calculation of each of the figures in this Exhibit.
- b. The exhibit states that the information on this Exhibit comes from "data compiled by NNA." Please explain fully how this data is obtained and compiled.
- c. Do the figures in the column entitled "Total Circulation" represent the number of copies, pieces, or some other measure?
- d. Please confirm that in 1995, the "Total Titles" figure increased by 737 over the "Total Titles" figure from 1994.
- e. Please confirm that in 1996, the "Total Titles" figure decreased by 538 from the "Total Titles" figure from 1995.
- f. Please fully explain any and all reasons for the increase and decrease described in subparts d. and e., above.
- g. Please fully explain why the "Total Circulation" figures over the three year period 1994-1996 remain relatively constant, while the "Total Titles" figures fluctuate considerably.
- h. Please provide the number of titles and the total circulation between 1960 and 1996, for those titles which exist over the entire time period. If this information cannot be provided, please furnish it for the time period between 1986 and 1996.

- i. Please provide the number of members by year (1990-1996) that constitute your "Total Circulation."
- j. Please subdivide the figures you provide in response to subpart i., above into the following categories:
 - i. ANPA/NAA members exclusively;
 - ii. NNA members exclusively; and
 - iii. both ANPA/NAA and NNA members.

If you cannot partition the figures in this manner please fully explain why not.

USPS/NNA-T1-14. Please show how you calculate the "10 percent of all weekly newspapers' total circulation . . . found in the within county mailstream," as you indicate at page 13, line 8 of your testimony. Please include all assumptions you make in determining this percentage.

USPS/NNA-T1-15. For each year fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide a list of publications published by Landmark Community Newspapers, Inc. and mailed at second-class regular or periodical regular rates.

USPS/NNA-T1-16. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please for each publication listed in response to interrogatory number 1 the following information:

- (a) The number of issues mailed.

- (b) The average number of editions (versions) per issue.
- (c) An indication of the kind or type of each version.

USPS/NNA-T1-17. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the total volumes mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-18. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular required presort rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-19. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular 3-digit city/5-digit presort rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-20. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular carrier route presort rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-21. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination delivery office discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-22. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination SCF discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-23. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular high density discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-24. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular saturation discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-25. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the required presort volumes

mailed at second-class regular or periodical regular prebarcoded letter size discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-26. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-27. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 3-digit letter size discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-28. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 5-digit letter size discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-29. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-30. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zones 1&2 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-31. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 3 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-32. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 4 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-33. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 5 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-34. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and

advertising weight mailed at second-class regular or periodical regular rates for zone 6 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-35. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 7 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-36. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 8 for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-37. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the average percentage of nonadvertising content mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-38. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

USPS/NNA-T1-39. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per pallet by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

USPS/NNA-T1-40. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to

interrogatory number 1, please provide the average pallet weight by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

USPS/NNA-T1-41. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

USPS/NNA-T1-42. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per sack by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

USPS/NNA-T1-43. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays

- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

USPS/NNA-T1-44. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per tray by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

USPS/NNA-T1-45. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in bundles

at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-46. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per bundle.

USPS/NNA-T1-47. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular rates that were plant loaded in USPS provided transportation for each publication listed in response to interrogatory number 1.

USPS/NNA-T1-48. Please also provide all data furnished in response to interrogatories 15 through 47 above in electronic format.

USPS/NNA-T1-49. Please fully define the term "partial census," as you use it at page 11, line 16 of your testimony.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 22, 1998