

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

**Six to Five Day Street Delivery)
And Related Service Changes)**

Docket No. N2010-1

**NATIONAL NEWSPAPER ASSOCIATION
INTERROGATORIES TO POSTAL SERVICE WITNESS NERI
NNA/USPS T4-1-6
(June 7, 2010)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, National Newspaper Association (NNA) submits interrogatories and requests for documents to United States Postal Service Witness Neri. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form. NNA respectfully requests that if the witness cannot respond to any interrogatory, the Postal Service will refer the question to a competent witness or provide an institutional response.

Respectfully submitted,

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NNA/USPS T4-1

Please confirm that newspaper Periodicals origin entered mail dropped at a BMEU on Saturday will be process in outgoing sortations on Monday.

NNA/USPS T4-2

Is it your expectation that incoming primary operations for the newspaper mail referred to in T4-1 will be worked as follows:

For zones 1-2, on Tuesday
For zones 2-4 on Wednesday
For remaining zones on Thursday or later

If you do not confirm, please state your expectations

NNA/USPS T4-3

How many FSM 1000 machines are currently in operation in processing plants or delivery offices?

NNA/USPST4-4

Do you believe that a greater aggregation of incoming mail for Monday processing could result in greater use of FSM 1000 machines, if any remain operational?

NNA/USPS T4-5

If a significant amount of mailer behavior shifts mail from Saturday entry to Monday, rather than to Friday, how would that affect processing operations plans?

NNA/USPS T4-6

If a significant amount of mail shifts from Saturday entry to any day other than Friday, which you state permits the use of excess capacity on Monday, will your projections for cost savings change? If so, please describe any contingency calculations you have made to address the possibility for an unpredicted mail entry change.