

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES
NNA/USPS-T10-1 AND T10-2

The United States Postal Service hereby provides the response of witness Thomas Day to the above-listed interrogatories of the National Newspaper Association dated June 7, 2010. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS T10-1

Please confirm that the Postal Service does not presently have a system in place for measurement of Within-County Periodicals mail. If you do not confirm, please explain.

RESPONSE

The measurement of all Periodicals currently is provided via data from the mailing industry. Specifically, the Postal Service utilizes data from the Red Tag and Deltrak systems. There is an extremely small presence of In-County publications in these data, which are not statistically valid even at the national level.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS T10-2

Do you believe that within the next three years newspaper mail in the Within-County and Outside-County Periodicals products will participate in full-service Intelligent Mail Barcode (IMb) in a way that will enable the Postal Service to measure service for this mail?

RESPONSE

The participation of Periodicals in Full Service Intelligent Mail should allow for a statistically valid measurement of Outside County Periodicals. This is not the case for In-County Periodicals, which by their very nature are not likely to participate in Full Service Intelligent Mail. Given the mailing characteristics and point of entry for In-County Periodicals, automated processing (necessary to capture Full Service Intelligent Mail data) is not likely to occur.