

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

Postal Rate Commission
Submitted 6/7/2006 3:05 pm
Filing ID: 49363
Accepted 6/7/2006

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS DONALD J. O'HARA
(NAA/USPS-T31-1-7)**

June 7, 2006

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Donald J. O'Hara (USPS-T-31) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: _____

William B. Baker
WILEY REIN & FIELDING LLP
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 719-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

June 7, 2006

William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS DONALD O'HARA
(NAA/USPS-T31-1-7)**

NAA/USPS-T31-1: Please refer to page 30, lines 15-17, of your testimony where you compare the unit contributions at proposed rates for Standard Regular and Enhanced Carrier Route mail.

- a. Please provide citations to the inputs that you used in making those calculations.
- b. Using the same methodology as in (a), please provide the contribution per piece at proposed rates of:
 - i. First Class letters subclass
 - ii. First Class single piece letters
 - iii. First Class presorted letters
 - iv. First Class cards subclass
 - v. Periodicals Outside County Regular Rate
 - vi. Periodicals In-County

NAA/USPS-T31-2: Table B-1 of your testimony presents the long-run own-price elasticities for various classes of mail estimated by witness Thress. You state on page 10 that the lower the absolute value of a type of mail, the greater its value of service. In view of the testimony of witness Bernstein on the subject of diversion of First-Class Mail to electronic alternatives, do you believe that First-Class Mail truly has a higher value of service than any other type of mail in Table B-1? Why?

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS DONALD O'HARA
(NAA/USPS-T31-1-7)**

NAA-USPS-T31-3: For many years, First-Class Mail has both been a majority of the mailstream and has paid a majority of institutional costs. First-Class Mail is no longer a majority of the mailstream. Should First-Class Mail's relative decline as a share of the mailstream lead to a reduction in its institutional cost burden? Why or why not?

NAA/USPS-T31-4: Please refer to page 29, lines 19-22 of your testimony. Did you review any information regarding the number and size of alternate delivery firms in preparing your testimony? If so, please describe what information you reviewed.

NAA/USPS-T31-5: Please refer to page 29, lines 19-22 of your testimony. Is it your understanding that newspaper Total Market Coverage programs typically use Standard Enhanced Carrier Route mail (high-density or saturation levels as appropriate) to deliver preprints to nonsubscribers of the newspaper?

NAA/USPS-T31-6: Please refer to page 29, lines 1-6 of your testimony. Are you aware of any information held by the Postal Service regarding how often it "is able to accommodate mailer requests for delivery within specific and sometimes relatively tight time frames"? If so, please provide such information. If not, please explain the basis for the quoted statement.

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS DONALD O'HARA
(NAA/USPS-T31-1-7)**

NAA/USPT-T31-7: Please refer to page 29, lines 4-6 of your testimony. Is it your understanding that for the Postal Service to accommodate mailer requests for delivery within particular time frames for high-density and saturation mailings, the mailers must use destination entry? If so, please explain whether the Postal Service is able to achieve the same accommodations if the mailings are entered at the destination SCF than if entered at the destination DDU.