

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

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF THE NATIONAL NEWSPAPER
ASSOCIATION TO POSTAL SERVICE WITNESS BOZZO, USPS T46
(NNA/USPS-T46-1-17)

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service A. Thomas Bozzo and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

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June 19, 2006

NNA/USPS-T46-1 Please refer to Table 1, the Beta Test Direct Tally Subclass Distribution that appears on page 21 of your testimony (USPS-T-46). With respect to this table, please provide the comparable percentage distributions for both beta and non-beta tests for Clerk and Mail Handler and for Carrier Direct tallies that were tabulated for Within County Periodicals. If Within County Periodicals were not studied in either or both of these tests, please explain why they were not studied.

NNA/USPS-T46-2 With regard to Table 6 that appears on page 34 of your testimony (USPS-T-46), please provide supporting citations from statistical literature that define the term “Approximate Standard Difference” that appears in the last column of Table 6.

NNA/USPS-T46-3 With regard to Table 6 that appears on page 34 of your testimony (USPS-T-46), please define the term, “approximate CV” as that term appears in the supporting note on Table 6.

NNA/USPS-T46-4 With regard to Table 6 that appears on page 34 of your testimony (USPS-T-46), Please explain why you have used “CV’s” in the calculations that appear on Table 6.

NNA/USPS-T46-5 With regard to Table 6 that appears on page 34 of your testimony (USPS-T-46), please confirm that the “approximate CV” for Within County Periodicals that was used to derive the Approximate Standard Difference of 3.40 shown in the last column of Table 6 was 16.4%. If this value cannot be confirmed, please provide the correct CV for Within County Periodicals that was used in this calculation and supporting work papers showing how this CV was derived.

NNA/USPS-T46-6 With regard to Table 6 that appears on page 34 of your testimony (USPS-T-46), please provide the underlying data that was specifically

used to calculate each change in the mail processing cost for Within County Periodicals that appears in the row labeled Within County Periodicals.

NNA/USPS-T46-7 On page 35 of your testimony (USPS-T-46), you state at lines 7-8, “The Within-County increase appears to have resulted from new methods to facilitate identification of Periodicals in the redesigned Question 23.” With respect to this statement, please define each new method to which you are referring and explain fully how each new method “facilitated” the identification of Periodicals as compared to prior years.

NNA/USPS-T46-8 On page 35 of your testimony (USPS-T-46), you state at lines 12-15, “In FY 2004, the Periodicals lookup list was greatly expanded, from fewer than 1,500 titles to more than 20,000 titles, resulting in an increase in tallies concentrated in Outside-County Periodicals titles added to the list in FY 2004.” With respect to this statement, please provide the increases in actual tallies that resulted from the expansion of the lookup list in FY 2004 that was observed for Outside County Periodicals and for Within County Periodicals.

NNA/USPS-T46-9 On page 35 of your testimony (USPS-T-46), you state at lines 19-21, “Between BY 2004 and BY 2005, the increase in Periodicals tallies was concentrated in Within-County titles not included in the FY 2004 or pre FY 2004 lookup lists.” With respect to this statement, please provide a list of all Within County lookup titles where tallies were recorded in BY 2005 that were included in the FY 2004 lookup list and a separate list of all Within County titles where tallies were recorded in BY 2005 that were not on the FY 2004 lookup list.

NNA/USPS-T46-10 On page 36 of your testimony (USPS-T-46), you state at lines 1-3, “Any tally preliminarily identified as Within-County Periodicals in the automated processing of IOCS data is reviewed for evidence of eligibility to claim Within County rates (See USPS-LR-L-9, Appendix D)” With respect to this statement, please describe fully how such preliminarily identified tallies are “reviewed for evidence of eligibility” to claim Within County rates.

NNA/USPS-T46-11 On page 36 of your testimony (USPS-T-46), you state at lines 1-3, “Any tally preliminarily identified as Within-County Periodicals in the automated processing of IOCS data is reviewed for evidence of eligibility to claim Within County rates (See USPS-LR-L-9, Appendix D)” With respect to this statement, please confirm that if a tally has been reviewed for evidence of eligibility to claim Within County rates and if evidence has been found to support that claim, that the Postal Service then assumes, in all such cases, that the postage for that underlying piece was actually calculated at Within County Rates. Please explain any answer other than a confirmation.

NNA/USPS-T46-12 On page 36 of your testimony (USPS-T-46), you state at lines 1-3, “Any tally preliminarily identified as Within-County Periodicals in the automated processing of IOCS data is reviewed for evidence of eligibility to claim Within County rates (See USPS-LR-L-9, Appendix D)” With respect to this statement, please describe any circumstances known to you where a Periodical might be eligible to claim Within County status but nevertheless was not mailed at Within County rates. Explain each circumstance fully.

NNA/USPS-T46-13 On page 36 of your testimony (USPS-T-46), you state at lines 3-6 “Since title information must be entered in IOCS, and the tallies are reviewed after processing, I consider it unlikely that piece not belonging to the Within-County subclass are being misidentified.” With respect to this statement please provide any reasons other than the reasons described at lines 3-6, why Dr. Bozzo considers it unlikely that pieces not belonging to the Within-County subclass are being misidentified.

NNA/USPS-T46-14 On page 36 of your testimony (USPS-T-46), you state at lines 6-7, “The photocopy and keying studies also showed no tendency for data collectors to misidentify pieces of other classes as Periodicals.” Please confirm that neither the photocopy nor keying studies specifically analyzed Within County Periodical pieces. Explain any answer other than a confirmation.

NNA/USPS-T46-15 Does "evidence of eligibility" as you use the term on p. 36 of your testimony mean that the Postal Service has determined for each title listed in the lookup titles referenced on p. 35 that the publication's characteristics are in compliance with 39 USC §3626? If your answer is yes, please explain how the Postal Service made this determination for each publication. If your answer is no, please explain what "evidence of eligibility" means.

NNA/USPS-T46-16 Please confirm that a publication eligible to mail at Within County rates may also enter pieces into the mailstream that are not eligible for Within County rates, and that such pieces might appear identical to the eligible pieces.

NNA/USPS-T46-17 Please confirm that a publication mailed by a Within-County-eligible publisher that is received by a recipient outside the publisher's county of entry will likely be ineligible for the Within County subclass, and if you do confirm, please explain how the data collector would be trained and/or prompted by the options in Question 23 to correctly identify that mailpiece.