

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY PAFFORD  
TO INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION  
NNA/USPS-T3-25, 27-28

The United States Postal Service hereby provides witness Pafford's responses to the following interrogatories of the National Newspaper Association, filed on July 13, 2006: NNA/USPS-T3-25, 27-28. Interrogatory NNA/USPS-T3-26 was redirected to the Postal Service for an institutional response.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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July 27, 2006

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

**NNA/USPS-T3-25.** Please provide the revenue, piece and weight data for Within County Mail produced by the BRPW on a per-quarter basis for the Base Year.

**RESPONSE:**

These data are provided publicly in the Quarterly RPW Report. The BRPW estimate is listed under the "Periodicals In-County" line item of this report. Base Year data are also available in USPS-LR-L-20.

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

**NNA/USPS-T3-26.** Please confirm that in R2000-1 and R97-1, the Commission adjusted volume figures projected for the test year for the Within County subclass to use a multi-year average on the basis of data produced by BRPW. If you do not confirm, please fully explain your response.

**RESPONSE:**

Redirected to the Postal Service.

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

**NNA/USPS-T3-27.** Please provide for the base years used in dockets R2000-1 and R97-1 the percentage of reported volume derived from the probability-based sample? From the census-based system, e.g. Postal One?

**RESPONSE:**

The percentage of In-County volume from the probability-based sample in Base Year 1999 for the R2000-1 case was 49.0%. The Base Year 1996 percentage is not available or applicable as I understand it. The estimation procedure was changed, and the current design structure has been in use since the R2000-1 case.

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

**NNA/USPS-T3-28.** With respect to your response to NNA/USPS T3-1 for Within County subclass:

- a) Why did you choose to calculate CVs?
- b) Do you believe CVs have value in understanding the revenue, piece and weight data with respect to this subclass?
- c) Why did you choose 95% as an acceptable variation?

**RESPONSE:**

- a- c. See my response to NNA/USPS-T3-1 that lists Rule 31(k)(2)(ii) requiring the Postal Service to provide confidence limits for major estimates. Ninety-five percent confidence limits are 1.96 times the estimated standard of the estimate, and, therefore, when one provides the confidence interval one is also providing the coefficient of variation. Confidence intervals have value in understanding the degree with which the estimate can vary due to sampling variation.