

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BOOKSPAN

Docket No. MC2005-3

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS YORGEY
(OCA/USPS-T2-6)**

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Office of the Consumer Advocate, filed on July 27, 2005, and redirected from witness Yorgey: OCA/USPS-T2-6.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999, Fax -5402
scott.l.reiter@usps.gov
August 10, 2005

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TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS YORGEY

OCA/USPS-T2-6. Please refer to the Request at Attachment A, Section 620.12 of the proposed Domestic Mail Classification Schedule (DMCS).

- a. For each year of the Bookspan NSA, please quantify the baseline multiplier effect to be used to evaluate functionally equivalent NSAs.
- b. Please explain how the Postal Service intends to evaluate the functional equivalency to the Bookspan NSA of any proposed NSAs “involving declining block rates of Standard Mail letter solicitations for book or analogous club memberships” in the absence of quantifying the baseline multiplier effect.
- c. Does the Postal Service have rules, or does it intend to propose rules, to implement proposed Section 620.12 that are analogous to DMM § 709.1.0, General Requirements for Negotiated Service Agreements (NSAs). Please explain.

RESPONSE:

a.-c. The baseline multiplier effect is a defining characteristic of the Bookspan NSA, and the Postal Service considers the existence of a multiplier effect to be a necessary precondition for customers seeking to be candidates for functionally equivalent NSAs. However, the multiplier effect must be taken together with the other customer specific variables that the Postal Service must consider when negotiating with an NSA customer. Quantifying a specific required multiplier effect would create a binding constraint that would impede future negotiations and might exclude otherwise worthy customers from consideration. Given that all functionally equivalent agreements must be litigated prior to implementation, adequate opportunity for review and analysis is ensured.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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