

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

Postal Rate Commission
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Rate and Service Changes To Implement
Baseline Negotiated Service Agreement With
Bookspan

Docket No. MC2005-3

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS MICHAEL K. PLUNKETT
(NAA/USPS-T1-6-8)
September 6, 2005**

The Newspaper Association of America hereby submits the attached
interrogatories to United States Postal Service witness Michael K. Plunkett (USPS-T-1)
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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.

September 6, 2005

William B. Baker
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NAA/USPS-T1-6: Please refer to your responses to NAA/USPS-T1-4 and OCA/USPS-T1-7(d). To be functionally-equivalent to the Bookspan NSA, must an NSA have a multiplier effect:

- a. that generates mail in at least two subclasses; and
- b. at least one subclass consists of mail other than monthly billing and payment First-Class Mail?

NAA/USPS-T1-7. Please refer to your response to OCA/USPS-T1-7 regarding the “qualitative” evaluation of the multiplier for a possible functionally-equivalent NSA.

- a. Is there a volume level at which a mailer generates too little volume to be considered for a functionally-equivalent NSA? Is that considered quantitatively or qualitatively?
- b. Would a mailer whose “multiplier effect” is proportionately greater than that of Bookspan’s, but because of its smaller size generates less volume than the Bookspan multiplier, be similarly-situated? In other words, is the multiplier effect assessed proportionately, or by absolute number of pieces?

NAA/USPS-T1-8. Please refer to your response to OCA/USPS-T1-7, wherein you state that the proposed DMCS provision is intended to indicate that to be eligible for a functionally-equivalent NSA, a mailer would have to be engaged in a “similar business model” as Bookspan and exhibit “similar mailing behavior.”

- a. Please elaborate on what would constitute a “similar business model.”

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- b. Does a similar business model mean that the mailer must operate pursuant to the Federal Trade Commission's Negative Option Rule?
- c. Please elaborate on what would constitute "similar mailing behavior." Include in your response whether a mailer would have to expect to have flat or declining solicitation mail volumes in the future.