

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

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Postal Rate and Fee Changes, 1997

Docket No. R97-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

NEWSPAPER ASSOCIATION OF AMERICA
NOTICE OF ISSUES TO BE RAISED AT PREHEARING CONFERENCE
(July 25, 1997)

The Newspaper Association of America ("NAA"), pursuant to Order No. 1186, hereby gives notice that it expects to discuss at the prehearing conference both the motion of the Direct Marketing Association and the Motion of Douglas Carlson to clarify the proposed rules of practice.

As to the DMA motion, NAA, for one of the few times in these proceedings, fully agrees with the DMA. As DMA notes, this case differs greatly from Docket No. R94-1 in that, *inter alia*, (1) this case is not an across-the-board request; (2) this case is not the subject of a proposed settlement agreement; (3) in this case the Postal Service has proposed significant changes to costing methodologies in a number of areas; and (4) the Postal Service has chosen to support its proposals with 42 separate pieces of testimony and more than 200 library references. While the unusual circumstances of the Docket No. R94-1 Request justified an accelerated timetable, similar circumstances are not present in this case and a timetable more resembling that of other rate cases appears more appropriate at this stage.

Furthermore, the Postal Service's delay in filing the information required under Commission rule 54(a)(1) has impeded the ability of intervenors to assess the significance of some of the changes in costing methodology proposed by the Postal Service.

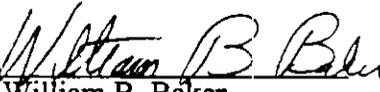
As for Mr. Carlson's motion, NAA believes that section 3 (C) of the proposed special rules of practice may benefit from clarification. In particular, NAA believes that parties should

always be required to serve discovery answers on all parties; such answers are potential record evidence, often clarify (if not modify) written testimony, and fairness to all participants would seem to require that they be served. In contrast, objections and motions to compel, while often of some interest, are not potential record evidence and the same considerations of fairness do not seem to apply. Parties are, of course, free to request that they be served with objections, motions to compel, and responses thereto.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

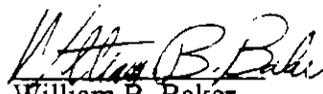
Robert J. Brinkmann
NEWSPAPER ASSOCIATION
OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By: 
William B. Baker
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C.
20006-2304
(202) 429-7255

July 25, 1997

Certificate of Service

I hereby certify that I have this 25th day of July, 1997, served the foregoing document upon the United States Postal Service in accordance with sections 12 and 20(c) of the rules of practice.


William B. Baker