

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

Repositionable Notes Market Test )

Docket No. MC2004-5

**FIRST SET OF DISCOVERY REQUESTS OF  
THE NATIONAL NEWSPAPER ASSOCIATION  
TO USPS WITNESS KANEER  
(NNA/USPS T2-1-5)**

Pursuant to rules 25 to 28 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the following interrogatories to United States Postal Service witness Kaneer. If witness Kaneer is unable to respond, please provide a response from another witness, employee or representative of the Postal Service.

Respectfully submitted,

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NNA/USPS T2-1 Do you agree that one element of value of service typically considered under 39 USC 3622(b) could include the degree to which the mailer experiences competition from within or outside the mailstream and therefore may find postal rates or services cost-effective, or not, depending upon its relation to competitors' costs?

NNA/USPS T2-2 Are you aware of the use of RPNs by privately-delivered newspapers in the United States today? If your response is affirmative, please explain how you believe that usage would affect competitors of those newspapers wishing to use RPNs under the proposal in this docket?

NNA/USPS T2-3 If your response to NNA/USPS T2-2 was negative, would it be reasonable to assume that a postal customer desiring to use RPNs in competition with a privately-delivered newspaper also using RPNs would be extremely concerned about cost of postage?

NNA/USPS T2-4 If you were to assume that a within county periodicals mailer desiring to use RPNs operates in a market where a competitive privately-delivered newspaper is able to use RPNs for a negligible incremental cost, would your consideration of a separate rate for the within county mailer be different from the rates proposed by the Postal Service in this docket? Please explain your response.

NNA/USPS T2-5 At the time you submitted your testimony, had you considered a separate rate for Repositionable Notes for the within county subclass? If your answer is negative, do you now believe a separate rate would be appropriate?