

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 HOLLAND  
(NNA/USPS T1-1-4)**

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 Holland. If witness Holland 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 T1-1 Please confirm that Periodicals mailpieces that are in carrier-route bundles are not likely to require automation and that therefore Repositionable Notes attached to them would have an even lesser chance of creating the concerns addressed by the Pilot Test referenced in your testimony on page 2. If you cannot confirm, please explain.

NNA/USPS T1-2 Please confirm that Periodicals mailpieces entered at delivery units are not likely to require automation and that therefore Repositionable Notes attached to them would have an even lesser chance of creating the concerns addressed by the Pilot Test referenced in your testimony on page 2. If you cannot confirm, please explain.

NNA/USPS T1-3 Please confirm that within county newspapers are typically not sorted by automation and that Repositionable Notes attached to those pieces would have an even lesser chance of creating the concerns addressed by the Pilot Test referenced in your testimony on page 2. If you cannot confirm, please explain.

NNA/USPS T1-4 Please confirm that RPNs on within county newspapers would be likely to be as problem free for carriers as the Standard Mail pieces tested and referred to in your testimony on page 3.