

2. The Newspaper Association of America is a non-profit organization representing more than 2,000 newspapers in the United States and Canada. Most NAA members are daily newspapers, accounting for 87 percent of the daily circulation in the United States.

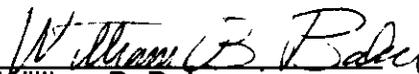
3. NAA members use all classes of mail, including First Class Mail, Periodicals mail, and Standard mail. NAA has an interest in the matters to be heard in this proceeding and its interests cannot adequately be represented by any other party.

4. NAA does not request a hearing in this proceeding.

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) 719-7255

October 22, 1999

Certificate of Service

I hereby certify that I have this 22nd day of October, 1999, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.


William B. Baker