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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000   Docket No. R2000-1

FIRST SET OF INTERROGATORIES OF
MAIL ORDER ASSOCIATION OF AMERICA TO
NEWSPAPER ASSOCIATION OF AMERICA WITNESS TYE (MOAA/NAA-T-1)

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of

America (MOAA), submits the following interrogatories to NAA witness Tye (NAA-T-1).

Respectfully submitted,

David C. Todd/HJR

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon the Postal Service

by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

David C. Todd/HJR

David C. Todd

Date: June 6, 2000

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INTERROGATORIES OF MAIL ORDER ASSOCIATION OF AMERICA TO NEWSPAPER ASSOCIATION OF AMERICA WITNESS TYE

MOAA/NAA-T-1-1 You claim that the USPS proposal for ECR will divert mail from private enterprise competitors (at 42-46).

a. In preparing your testimony, did you request data from the Newspaper Association of America about rates charged by newspapers for free standing inserts that you claim to be in competition with USPS Standard Mail A ECR?

b. If so, please provide copies of all data concerning said rates that were provided to you.

c. If not, is it your contention that newspaper rates for carrying competitive material are irrelevant to applying the pricing criteria of the Act?

d. In preparing your testimony did you request data from the Newspaper Association of America about the effect of weight upon the rates charged by newspapers for carrying free-standing inserts?

e. If so, please provide copies of all data concerning said rates that were provided to you.

f. If not, is it your contention that the effect of weight upon newspaper rates for carrying competitive material is irrelevant?