

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

RECEIVED

JUN 16 2 04 PM '00

Postal Rate and Fee Changes, 2000

Docket No. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
ALLIANCE OF INDEPENDENT STORE OWNERS
AND PROFESSIONALS WITNESS
RICHARD SMITH (NAA/AISOP-T1-1-9)
June 16, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to Alliance Of Independent Store Owners and Professionals witness Richard Smith (AISOP-T-1) and respectfully requests a timely and full response under oath.

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
E. Joseph Knoll III
Isaac R. Campbell
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

June 16, 2000


William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
ALLIANCE OF INDEPENDENT STORE OWNERS
AND PROFESSIONALS WITNESS
RICHARD SMITH (NAA/AISOP-T1-1-9)**

NAA/AISOP-T1-1. Of the 35,000 households that receive your ads weekly, how many are your customers?

NAA/AISOP-T1-2. Is the shopper that you use mailed? Is a private delivery shopper available in your area? What factors would determine whether you would use it?

NAA/AISOP-T1-3. What proportion of your advertising is delivered through pound-rated ECR mail?

NAA/AISOP-T1-4. Have the prices that you pay for advertising delivery risen, declined, or stayed the same since July 1996?

NAA/AISOP-T1-5. Please refer to page 3 of your testimony. You seem to say that you keep your profit margins "low" deliberately and do not attempt to maximize your profit. Is that your business practice?

NAA/AISOP-T1-6. Please refer to page 3 of your testimony. You say you have experimented with radio, cable, television, and larger daily newspapers. Have you also experimented with smaller daily newspapers, or local community weekly newspapers?

NAA/AISOP-T1-7. If the particular large daily newspaper in your market offered 1) to lower its ad rates; 2) to zone your advertising to an individual (or multiple) zip code(s); and 3) use a newspaper shopper to cover all the households in the targeted zips, would you consider switching to the newspaper advertising program?

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
ALLIANCE OF INDEPENDENT STORE OWNERS
AND PROFESSIONALS WITNESS
RICHARD SMITH (NAA/AISOP-T1-1-9)**

NAA/AISOP-T1-8. Please refer to page 4 of your testimony. There you say that the last time your mailer experienced a sizeable rate hike was in 1995. How do you know that? Do you know what the rate hike was?

NAA/AISOP-T1-9. As a small business, do you believe that large businesses should pay less than small businesses for the same postal service?