

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

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Postal Rate and Fee Changes, 2000

Docket No. ~~82000-1~~  
POSTAL RATE COMMISSION  
OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
SATURATION MAIL COALITION WITNESS  
HARRY J. BUCKEL (NAA/SMC-T1-1-5)  
June 19, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to the Saturation Mail Coalition witness Harry J. Buckel (NAA/SMC-T1-1-5) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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**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 19, 2000

William B. Baker  
William B. Baker

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HARRY J. BUCKEL (NAA/SMC-T1-1-5)

NAA/SMC-T1-1. Please refer to page 10 of your direct testimony where you state that since your last appearance before the Postal Rate Commission, the "competitive scale has tipped against shared mailers and in favor of hand delivery options." Please also refer to page 11 where you state that the "[r]ising costs for saturation mail, combined with the artificially contrived, excessive pound rate, have tipped the teeter totter to favor hand delivery."

- a. What saturation mail costs have risen since your last appearance before this Commission?
- b. Please refer to the testimony of Roger Merriman (also testifying on behalf of the Saturation Coalition) at page 5 where he states "[t]he stable postal rates of the last five years have been beneficial to my business . . . [t]hese have been the years of the greatest circulation growth in our saturation mail base and growth in our requester circulation for distribution outside our saturation coverage area." Do you believe that the "competitive scale" has tipped against his business in recent years?

NAA/SMC-T1-2. Of the three categories of saturation mail that you describe ("shopper segment", "shared mail", and cooperative coupon), please provide your best estimate of the proportion each comprises of total saturation commercial ECR mail.

NAA/SMC-T1-3. Of the three categories of saturation mail that you describe ("shopper segment", "shared mail", and cooperative coupon), please provide your best estimate of the extent to which each qualifies for destination entry discounts.

NAA/SMC-T1-4. Please confirm that the saturation ECR pound rate has not increased since July 1996. If you cannot confirm, please explain why not.

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NAA/SMC-T1-5. Please confirm that the saturation ECR pound rate has declined in real dollars since July 1996. If you cannot confirm, please explain why not.