

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

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Postal Rate and Fee Changes, 2000

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

**RESPONSE OF NEWSPAPER ASSOCIATION OF AMERICA
WITNESS WILLIAM B. TYE TO INTERROGATORY OF
MAIL ORDER ASSOCIATION OF AMERICA (MOAA/NAA-T1-1)
June 20, 2000**

The Newspaper Association of America hereby provides the response of witness witness William B. Tye to the following interrogatory of the Mail Order Association of America MOAA/NAA-T1-1, filed on June 6, 2000. Each interrogatory is stated verbatim and is followed by the response.

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 20, 2000

William B. Baker
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA WITNESS TYE
RESPONSE TO INTERROGATORY OF MAIL ORDER ASSOCIATION OF AMERICA

MOAA/NAA-T-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?

RESPONSE:

- a. No.
- b. Not applicable.
- c. No.
- d. No.
- e. Not applicable.
- f. No.

DECLARATION

I, William B. Tye, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

William B. Tye
WILLIAM B. TYE

Dated: June 20, 2000