

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

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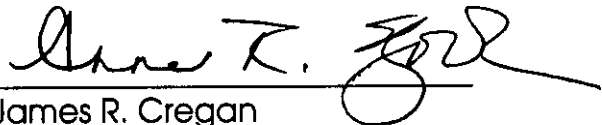
RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
WITNESS HAY TO FOLLOW-UP INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
OF THE UNITED STATES POSTAL SERVICE  
(USPS/MPA-T4-8)

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(JULY 28, 2000)

Magazine Publishers of America, Inc. hereby provides the responses of witness Hay to the following follow-up interrogatories of the United States Postal Service: USPS/MPA-T4-8, filed on July 14, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



James R. Cregan  
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Counsel  
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**RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA, INC. WITNESS HAY  
TO FOLLOW-UP INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE**

**USPS/MPA-T4-8.** Please refer to your response to interrogatory USPS/MPA-T4-5. This interrogatory requested copies of all contracts, agreements (including confidentiality and non-disclosure agreements), task orders, job descriptions, work proposals or other documents relating to your duties on the A.T. Kearney Data Quality Study discussed in your testimony.

- a) Please confirm that, notwithstanding the fact that you did not produce one in response to interrogatory USPS/MPA-T4-5, you did execute a confidentiality agreement in connection with your work for A.T. Kearney on the Data Quality Study. If you do not confirm, please explain fully.
- b) Please confirm that the attached document is a copy of a Confidentiality Agreement that was signed by you in connection with your work for A.T. Kearney on the Data Quality Study. If you do not confirm, please explain fully, including a full description of what you believe the attached document to be.
- c) Please provide a more legible copy of the Confidentiality Agreement referred to in part b), above.
- d) Please provide any other documents requested in interrogatory USPS/MPA-T4-5 that were omitted from your response.

**Response:**

- a. Confirmed.
- b. Confirmed. The Confidentiality Agreement as attached to this interrogatory was executed by me, with my signature, on 4th July 1998. Unfortunately, due to having moved offices three times since that date, my copy of this document was lost and I did not recall it at the time I answered the previous USPS interrogatories.
- c. I do not have a more legible copy of the agreement – or any other copy except the one sent to me as an attachment to this interrogatory.
- d. To my knowledge, there are no other documents responsive to this interrogatory, or any other interrogatories previously posed to me by the United States Postal Service.

**DECLARATION**

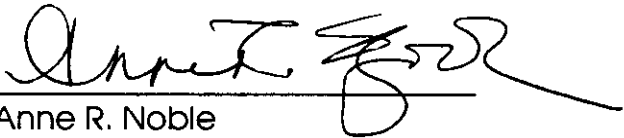
I, Keith Hay, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

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Date:

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.

  
Anne R. Noble

Washington, D.C.  
July 28, 2000