

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

RECEIVED

AUG 4 | 57 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**NEWSPAPER ASSOCIATION OF AMERICA  
SUPPLEMENTAL INSTITUTIONAL RESPONSE TO INTERROGATORY OF  
VAL-PAK DIRECT MARKETING SYSTEMS, INC. ET AL. (VP-CW/NAA-T1-11(c))  
August 4, 2000**

The Newspaper Association of America hereby provides the attached supplemental institutional response to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. *et al.* (VP-CW/NAA-T1-11(c)), filed on June 19, 2000.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker

Robert J. Brinkmann  
NEWSPAPER ASSOCIATION OF AMERICA  
529 14th Street, N.W.  
Suite 440  
Washington, D.C.  
(202) 638-4792

William B. Baker  
WILEY, REIN & FIELDING  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

**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.

August 4, 2000

William B. Baker  
William B. Baker

SUPPLEMENTAL RESPONSE OF NEWSPAPER ASSOCIATION OF AMERICA TO  
INTERROGATORY OF VAL-PAK AND CAROL WRIGHT PROMOTIONS

VP-CW/NAA-T1-11.

Please refer to your testimony at page 45, lines 17-18, where you state that "Witness Tolley's testimony shows that the shift in volume from the private sector to ECR has been significant."

- c. Please provide all information at your disposal concerning the volume of inserts carried by (i) newspapers who are members of NAA, or (ii) newspapers generally over the past four years, and indicate the source.

RESPONSE:

- (c) The only information responsive to this request at the disposal of the Newspaper Association of America is posted on its website at:  
<<http://www.naa.org/marketscope/databank/nppvvolume.htm>>. This page is found by going to the NAA web site (naa.org), clicking on "Marketscope," then "Marketdatabank," then "newspaper preprint insert volume". This data is based upon a NAA surveys of all daily newspapers, and consist of estimated figures extrapolated from the responses that were received.

The data presented is labeled "Newspaper Preprint Insert Volume Estimates." These estimates are for preprints delivered as part of the daily newspaper and include full run and partial run preprints. The data does not include preprints delivered to non-subscribers of the newspaper.

The latest year for which data is posted is 1997. Data was collected for 1998, but the size of the return did not allow for extrapolation and the data was discarded. as unreliable. Accordingly, the survey for 1999 data also collected data for 1998. This data is being processed and will be put on the

SUPPLEMENTAL RESPONSE OF NEWSPAPER ASSOCIATION OF AMERICA TO  
INTERROGATORY OF VAL-PAK AND CAROL WRIGHT PROMOTIONS

website at the above URL when processing is completed. NAA currently  
expects the data to be posted sometime in September 2000.