

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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS E. THRESS
(NAA/USPS-T8-1-5)
November 5, 2001**

The Newspaper Association of America hereby submits the attached
interrogatories to United States Postal Service witness Thomas E. Thress (USPS-T-8)
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 requesting such service in this proceeding in accordance with section 12 of
the Rules of Practice.

November 5, 2001

William B. Baker
William B. Baker

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INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS E. THRESS
(NAA/USPS-T8-1-5)

NAA/USPS-T8-1: Please refer to your testimony at Page 18, lines 1 through

13.

- a. Please explain how consumption expenditures on Internet Service Providers, through which consumers obtain access to a range of information and services, affects First Class mail volume.
- b. Do you assume that any particular percentage of consumption expenditures on Internet Service Providers equates to a substitute of electronic mail or Instant Messaging for First Class mail?
- c. Does your model take into account free e-mail accounts? If so, how?
- d. Does your model take into account consumer use of Internet services, including e-mail, through their workplaces, where the cost of Internet service is borne by the employer?

NAA/USPS-T8-2: Please confirm that your testimony indicates that Standard ECR has a higher cross-price elasticity with Internet advertising than does Standard Regular mail. Please explain why this is a reasonable result in light of the capability offered by the Internet to target consumers on the basis of factors other than geography.

NAA/USPS-T8-3: Please refer to your testimony at Page 50, line 21. Please explain your understanding of how the price of newspaper advertising affects Standard Enhanced Carrier Route mail volumes. Please include in your answer:

- a. Whether the price of newspaper advertising to which you refer reflects run-of-press newspaper advertising or of insert advertising or some combination of both;
- b. An explanation of how the cited price of newspaper advertising relates to ECR volume, as distinct from the volume of advertising preprints delivered via ECR mail.

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NAA/USPS-T8-4: Does your testimony regarding Standard Enhanced Carrier Route mail take into account, in any way, the prices charged by ECR shared mailers to advertisers for inclusion into a shared mailing? Please explain your answer fully.

NAA/USPS-T8-5: If your answer to the preceding question is in the affirmative, please identify the source of the data that you use for the price charged.