

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

**NEWSPAPER ASSOCIATION OF AMERICA
SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS E. THRESS
(NAA/USPS-T8-6-8)
November 26, 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 26, 2001

William B. Baker
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(NAA/USPS-T8-6-8)

NAA/USPS-T8-6: Please refer to your response to NAA/USPS-T8-1. If, as you say, consumers' use of the Internet in general "may" be indicative of the extent to which they use it as a substitute for mail, and consumer expenditures on Internet access is "a" measure of their use of the Internet, why can you be sure that consumer expenditures on Internet access in fact "reflects the extent" to which consumers use the Internet as a substitute for mail?

NAA/USPS-T8-7: Please refer to your response to NAA/USPS-T8-4. The question asked whether your testimony takes into account the prices charged by shared mailers to advertisers that participate in a shared mailing. Your answer is couched in terms of the size and number of advertisers within a shared mailing. Please answer the interrogatory as posed: that is, does your testimony take into account, in any way, the prices charged by Standard ECR shared mailers to the advertisers that participate in those shared mailings.

NAA/USPS-T8-8. Is it your testimony that the price charged to advertisers by ECR mailers is not relevant when one is estimating the volume of ECR mail? Please explain any answer that is not entirely in the affirmative.