

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

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Experimental Rate and Service Changes To
Implement Negotiated Service Agreement With
Capital One Services, Inc.

Docket No. MC2002-2

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO THE
UNITED STATES POSTAL SERVICE
(NAA/USPS-1-9)
October 17, 2002

The Newspaper Association of America hereby submits the attached
interrogatories to the United States Postal Service (NAA/USPS-1-6) and respectfully
requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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William B. Baker
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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.

October 17, 2002

William B. Baker
William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA
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(NAA/USPS-1-9)**

NAA/USPS-1: Please provide, as an update to Appendix G of the Request, a copy of the negotiated service agreement with Capital One that is dated and signed by the Postal Service. If a copy of the NSA that is dated and signed by both parties cannot be provided, please explain why not.

NAA/USPS-2: Please provide the Postal Service's calculation of "90% of Capital One's average First-Class Mail volume for Postal Service FY2000, FY2001 and FY2002" as referenced in Section III.D of the NSA submitted as Appendix G of the Request. Please include a showing of the calculation.

NAA/USPS-3: Please refer to Section III.F. of the NSA submitted as Appendix G of the Request and to the Testimony of witness Plunkett (USPS-T-2) at page 4 , footnote 1, and Appendix 1.

- a. Please confirm that the following language appears in Section III.F of the NSA (*emphasis added*):

If at the end of the first year after implementation, Capital One's First-Class Mail volume, as defined in Article III, Paragraph C above, falls below 1.025 billion pieces, the following discounts shall apply for the second and third years of the Agreement: . . .

- b. Please confirm that at USPS-T-2, Appendix 1, the following language appears (*emphasis added*):

In the event Capital One's First-Class volume in any year of the agreement is below 1.025 billion pieces, the following discount structure would be activated: . . .

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- c. Please clarify whether the lower discount schedule beginning at 1.025 billion pieces takes effect if Capital One's volume falls below that threshold in the first year only, or whether the lower discount threshold would take effect if Capital One's volume were above 1.025 billion in year 1, but fell below 1.025 billion pieces in year 2.

NAA/USPS-4: Please refer to the preamble of the NSA submitted as Appendix G of the Request, and in particular to the statement that the NSA "will be transferable to other mailers willing to meet the same conditions and terms." Please refer also to the Request, page 4, line 6, at which the Postal Service states: "As proposed, the changes would apply only to one, discretely-positioned mailer." Please clarify whether the NSA is available to other mailers, or if it applies only to one mailer.

NAA/USPS-5: Please refer to the preamble of the NSA submitted as Appendix G of the Request, and in particular to the statement that the NSA "will be transferable to other mailers willing to meet the same conditions and terms." Please indicate where the proposed DMCS language in Attachment A to the Request states that the NSA is available to other mailers willing to meet the same conditions and terms.

NAA/USPS-6: Please refer to Section IV.C of the NSA submitted as Appendix G of the Request, which states that the NSA "is effective on the latest date of signing by both parties." Please state on what date the NSA either did, or will, become effective.

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NAA/USPS-7: Please provide the number of First Class mailer production sites that have received certification to date under the Mail Preparation Total Quality Management (MPTQM) program.

NAA/USPS-8: Please provide the number of list mailers to have production sites certified to date under the Mail Preparation Total Quality Management program.

NAA/USPS-9: Please confirm that, to the best of the Postal Service's knowledge, other First Class mailers are, or can become, capable of:

- a. maintaining MPTQM in their mailing sites;
- b. achieving MPTQM certification at additional sites;
- c. cleansing address databases for customers not more than 30 days prior to mailings;
- d. cleansing solicitation address files no more than 60 days prior to mailing;
- e. use Electronic Address Correction Service information in marketing campaigns.

Where it is not possible to confirm, please explain why not.