

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  
UNITED STATES POSTAL SERVICE WITNESS ANITA J. BIZZOTTO  
(NAA/USPS-T1-1-3)  
October 17, 2002**

The Newspaper Association of America hereby submits the attached  
interrogatories to United States Postal Service witness Anita J. Bizzotto (USPS-T-1) and  
respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker  
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  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS ANITA J. BIZZOTTO  
(NAA/USPS-T1-1-3)**

NAA/USPS-T1-1: Please refer to the list of "potential agreements" presented at page 4, lines 21-23 of your testimony. Is it your testimony that, in the absence of the NSA that is the subject of this proceeding, Capital One would "decide to pursue nonmail alternatives"? If your answer is anything other than an unqualified no, please provide all evidence upon which you base a belief that Capital One would pursue "nonmail alternatives" in the absence of the NSA that it will not pursue due to the NSA.

NAA/USPS-T1-2: Please refer to Page 5, lines 19-21 of your testimony, where you state: "nonparticipating customers will see a reduction in their institutional cost burden as the total net contribution from Capital One increases."

- a. Please confirm that witness Crum estimates that the total net contribution from this NSA is approximately \$8.2 million.
- b. Please confirm that, according to the Commission's Opinion and Recommended Decision in Docket No. R2001-1, the total institutional costs to be recovered from all mail was more than \$28.041 billion.
- c. Please confirm that \$8.2 million is approximately 0.029 percent of \$28.041 billion.
- d. Please explain how nonparticipating mailers will "see" a reduction in their institutional cost burden" as a result of this NSA.

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NAA/USPS-T1-3: At any point during the negotiations with Capital One, did Capital One state that, in the event no deal were negotiated, that it would either:

- a. stop using the mail for solicitation;
- b. reduce its use of First-Class Mail for solicitations below previously projected levels;
- c. reduce its use of Standard mail for solicitations below previously projected levels;
- d. shift solicitations from First-Class Mail to Standard Mail.

Please explain your answers.