

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

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 CHARLES L. CRUM  
(NAA/USPS-T3-12-15)  
November 8, 2002**

The Newspaper Association of America hereby submits the attached  
interrogatories to United States Postal Service witness Charles L. Crum (USPS-T-3)  
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document in accordance  
with section 12 of the Rules of Practice and the Presiding Officer's rulings.

November 8, 2002

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William B. Baker

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORY TO  
UNITED STATES POSTAL SERVICE WITNESS CHARLES L. CRUM  
(NAA/USPS-T3-12-15)**

NAA/USPS-T3-12: Please refer to your response to OCA/USPS-T3-12(a). Is it a correct reading of your response that the Postal Service did not prepare a specific final analysis of the potential value of the Capital One NSA until you prepared your testimony?

NAA/USPS-T3-13: Please refer to Witness Wilson's testimony, page 4, lines 8-14, where he describes the change in treatment of UAA mail bearing the CSR endorsement.

- a. Please confirm that the costs you have utilized in your testimony are based on the current treatment of UAA mail bearing the CSR endorsement. If you do not confirm, please explain fully.
- b. If you confirm, please explain how costs will differ starting in January 2003, when UAA CSR mail that can be forwarded will be, instead of being discarded. Also, please apply these new costs to your testimony and provide the new cost/piece, estimated cost savings to the USPS as a result of the NSA, and the effect on net contribution to the USPS as a result of the NSA.

NAA/USPS-T3-14: Please refer to your response to NAA/USPS-T3-11. Please confirm that the \$0.066 cost/piece for the additional keystrokes does not include the cost of whatever media option Capital One chooses for ACS fulfillment (cartridge tape, CDROM disc, diskette, paper reports, or electronic file transfer).

- a. If you do confirm, please provide the cost/piece for media fulfillment and all relevant calculations.
- b. If you do not confirm, please explain how these costs are accounted for in the \$0.066 figure.

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NAA/USPS-T3-15: Please refer to your response to OCA/USPS-T3-12(b).

- a. What did you assume would be the average contribution of Capital One's Standard Mail?
- b. Please confirm that if any Capital One mail were to migrate from Standard Mail to First-Class Mail under the NSA, any reduction in net contribution due to the migration of that mail is not included in your calculation of net contribution. If you cannot confirm, please explain why not.