

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  
DESIGNATION OF WRITTEN CROSS-EXAMINATION AND  
REQUEST FOR ORAL CROSS-EXAMINATION OF  
UNITED STATES POSTAL SERVICE WITNESS  
MICHAEL K. PLUNKETT (USPS-T-2)  
November 27, 2002**

The Newspaper Association of America ("NAA") hereby gives notice of its intent to conduct oral cross-examination of United States Postal Service witness Michael K. Plunkett (USPS-T-2). NAA's cross-examination will focus on the witness's testimony and designated interrogatory responses.

NAA hereby designates the following interrogatory responses as its written cross-examination of witness Plunkett:

NAA/USPS-T2: 1, 5-8, 10-21  
NAA/USPS-T1 (redirected from Bizzotto): 3  
APWU/USPS-T2: 1-3, 6, 7  
APWU/USPS-T1 (redirected from Bizzotto): 1, 5  
OCA/USPS-T2: 1-8, 11, 12, 14-17, 22-23, 25, 36  
OCA/USPS-T3 (redirected from Crum): 1  
VP/USPS-T2: 1-3, 6, 7  
POIR1, Q: 4, 5  
POIR2, Q: 4, 5, 6

- 2 -

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By:

\_\_\_\_\_  
William B. Baker  
WILEY REIN & FIELDING LLP  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

### **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 and the Presiding Officer's Rulings.

November 27, 2002

\_\_\_\_\_  
William B. Baker