

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement)
Baseline Negotiated Service Agreement)
with Bookspan)

Docket No. MC2005-3

OFFICE OF CONSUMER ADVOCATE
INTERROGATORIES TO BOOKSPAN
WITNESS MATTHIAS EPP (OCA/BOOKSPAN-T2-1-5)
July 29, 2005

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T2-1-5 dated July 27, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/BOOKSPAN-T2-1. Please refer to your testimony at page 10, Table 1.

- a. For Fiscal Years 2002, 2003, 2004, please provide the monthly historic solicitation volumes for “New Membership Std letter-size” pieces and “New membership Std Flat-size” pieces.
- b. For Fiscal Year 2005 to date, please provide the monthly solicitation volumes for “New Membership Std letter-size” pieces and “New membership Std Flat-size” pieces.
- c. For the remainder of Fiscal Year 2005, please provide the projected monthly solicitation volumes for “New Membership Std letter-size” pieces and “New membership Std Flat-size” pieces.

OCA/BOOKSPAN-T2-2. Please refer to your testimony at page 10, lines 3-4, where it states “For example, among these factors are BOOKSPAN’s decision to severely limit our telemarketing during our last fiscal year.”

- a. What factor(s) caused Bookspan to “severely limit” its telemarketing during FY 2004? Please explain.
- b. Will the factor(s) that caused Bookspan to “severely limit” its telemarketing during FY 2004 severely limit Bookspan’s telemarketing during Fiscal Years 2006, 2007, and 2008? Please explain.

OCA/BOOKSPAN-T2-3. Please refer to your testimony at page 10, lines 3-4, where it states “For example, among these factors are BOOKSPAN’s decision to severely limit our telemarketing during our last fiscal year.”

- a. For Fiscal Years 2002, 2003, 2004, please provide the monthly volume of telemarketing calls.
- b. For Fiscal Year 2005 to date, please provide the monthly volume of telemarketing calls.
- c. For the remainder of Fiscal Year 2005, please provide the projected monthly volume of telemarketing calls.

OCA/BOOKSPAN-T2-4. Please refer to your testimony at page 10, lines 4-6, where it states "The portion of our marketing budget that had been previously dedicated to telemarketing campaigns was applied to our direct mail campaigns." For Fiscal Years 2006, 2007, and 2008, will the portion of Bookspan's marketing budget dedicated to telemarketing campaigns be applied to Bookspan's direct mail campaigns? Please explain.

OCA/BOOKSPAN-T2-5. Please refer to your testimony at page 10, lines 4-6, where it states "The portion of our marketing budget that had been previously dedicated to telemarketing campaigns was applied to our direct mail campaigns." For Fiscal Years 2006, 2007, and 2008, please provide the projected monthly volume of telemarketing calls.