

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 UNITED STATES POSTAL SERVICE  
(OCA/USPS-1-2)  
August 11, 2005

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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/USPS-1. Please refer to the response to OCA/USPS-T2-6(a)-(c), where it states “Quantifying a specific required multiplier effect would create a binding constraint that would impede future negotiations and might exclude otherwise worthy customers from consideration.”

- a. Please confirm that Section 620.12 of the proposed Domestic Mail Classification Schedule (DMCS) states, “Functionally equivalent NSAs . . . may be entered into with other customers *demonstrating a similar or greater multiplier effect* . . . (emphasis added). If you do not confirm, please explain.
- b. Please confirm that Section 620.12 of the proposed DMCS creates a “binding constraint . . . that might exclude otherwise worthy customers from consideration.” If you do not confirm, please explain.
- c. Given that Section 620.12 specifies that other customers must demonstrate a similar or greater multiplier effect than Bookspan, please explain how the Postal Service intends to evaluate the functional equivalency to the Bookspan NSA of any proposed NSA “involving declining block rates of Standard Mail letter solicitations for book or analogous club memberships” in the absence of quantifying Bookspan’s multiplier effect.

OCA/USPS-2. Please refer to the Request at Attachment A, Section 620.12 of the proposed Domestic Mail Classification Schedule (DMCS). Does the Postal Service have rules, or does it intend to propose rules, to implement proposed Section 620.12 that are analogous to DMM § 709.2.0, Capital One Services, Inc. NSA. Please explain.