

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

Postal Rate Commission
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Rate and Service Changes To Implement
Baseline Negotiated Service Agreement With
Bookspan

Docket No. MC2005-3

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS MICHAEL K. PLUNKETT
(NAA/USPS-T1-1-5)
August 11, 2005**

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

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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.

August 11, 2005

William B. Baker
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NAA/USPS-T1-1: Please confirm that the declining block volume discount rate structure in this NSA applies only to letter-shaped pieces, and not flats. If you cannot confirm, please explain why not. If you confirm, please explain why the declining block volume discounts are available only for letters and not flats.

NAA/USPS-T1-2. Please refer to your response to OCA/USPS-T2-6 (redirected from witness Yorgey), where you state that the “multiplier effect” is a “defining characteristic of the Bookspan NSA.” If there were no multiplier effect, would you have recommended that the Postal Service sign the NSA?

NAA/USPS-T1-3. Please refer to your response to OCA/USPS-T2-6 (redirected from witness Yorgey). What criteria will the Postal Service apply in determining whether a sufficient “multiplier” effect exists for purposes of assessing a mailer’s eligibility for a functionally-equivalent NSA?

NAA/USPS-T1-4. Would a mailer seeking an NSA that is “functionally-equivalent” to the Bookspan NSA necessarily have to expect that the NSA would generate other mail that would be entered at Bound Printed Matter and First Class Mail rates?

NAA/USPS/T1-5. Please refer to page 4 of your testimony, in which you present your views as to the usefulness of declining block volume discounts in Standard Mail. You state that “one could argue that virtually all Standard Mail is sent for

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discretionary purposes; thus, the prudent extension of declining block rates into Standard Mail will enable greater use of this technique, and create opportunities for further increases in contribution.”

- a. Is it your position that “virtually all Standard Mail is sent for discretionary purposes”?
- b. What considerations do you apply in deciding whether a proposed extension of declining block rates into Standard Mail would be “prudent”?