

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 ROBERT J. POSCH, JR.
(OCA/BOOKSPAN-T1-1-4)
August 15, 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-T1-1. Please refer to your testimony at page 2, lines 2-5. How widespread is the existence of the “massive multiplier effect” in the direct mail industry? Please explain. What percent of the direct mail industry generates business for the Postal Service through a massive multiplier effect.? Please explain.

OCA/BOOKSPAN-T1-2. Please refer to your testimony at page 4, lines 6-7, where it states “One BOOKSPAN solicitation generates anywhere from 50 to 60 mailpieces for each member that is successfully recruited.”

- a. Please confirm that the 50 or 60 mailpieces are generated over the course of one year. If you do not confirm, please explain.
- b. Does BOOKSPAN pay (or affix) the postage for the 50 or 60 mailpieces generated for each member that is successfully recruited? Please explain, and give examples of mailpieces where the member typically pays postage.
- c. How many solicitations are required to generate one new member? Please explain.

OCA/BOOKSPAN-T1-3. Please refer to your testimony at page 4, lines 13-23, and page 5, at lines 1-20, which itemizes a. through k., the mailstream a typical member generates over the course of one year. Please allocate the 50 or 60 mailpieces generated by the typical member to items a. through k.

OCA/BOOKSPAN-T1-4. Please refer to your testimony at page 4, lines 13-23, and page 5, lines 1-20, which itemizes a. through k., the mailstream a typical member

generates over the course of one year. For Fiscal Years 2002, 2003, 2004, and 2005, please estimate the annual volume of mailpieces for items a. through k.