

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

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-1-2)**

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate, filed on August 11, 2005:

OCA/USPS-1-2.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Scott L. Reiter

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August 25, 2005

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

- a. Confirmed.
- b. Not confirmed. Please see the response of witness Plunkett to OCA/USPS-T1-7.
- c. Please see the response of witness Plunkett to OCA/USPS-T1-7.

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**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.

**RESPONSE:**

The Postal Service intends to do so.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

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August 25, 2005