

**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

**RESPONSE OF WITNESS EPP TO INTERROGATORIES OF THE OFFICE OF
THE CONSUMER ADVOCATE (OCA/BOOKSPAN-T2-6 AND 7)**

(August 30, 2005)

Bookspan hereby provides the response of Witness Epp to Office of the Consumer Advocate interrogatories OCA/BOOKSPAN-T2-6 and OCA/BOOKSPAN-T2-7, filed August 10, 2005. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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RESPONSE OF BOOKSPAN WITNESS EPP TO INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE

OCA/BOOKSPAN-T2-6. Please turn to your testimony, Table 1 on page 10. You provide historical data for New Membership Standard letter-size and New Membership Standard Flat-size solicitation volumes for Postal Service FY 2002, FY 2003, and FY 2004. Please provide comparable data for FY 1999, FY 2000, and FY 2001.

Response:

There is no data available for the years 1999 through 2000, because Bookspan did not exist until March, 2000, and it took the company some time to develop and integrate its systems. The following are *estimates* for 2001 mail based on Bookspan's calendar year – not the Postal Service's Fiscal Year. These estimates were developed based on the percentages of Bookspan's Standard Mail in each rate category. The figures were not reconciled as part of reaching an agreement on the NSA, and given our experience reconciling Bookspan data with Postal Service CAPS data for Postal fiscal years 2003 and 2004, we fully expect these figures to vary from Postal Service figures. The differences between the calendar years, and significant effort involved in performing this reconciliation limit the value of examining 2001 data. With this in mind, we provide the following response:

	FY 2001	
New Membership Std letter-size	59,757,158	21%
New Membership Std flat-size	224,800,735	79%
Total	284,557,893	

RESPONSE OF BOOKSPAN WITNESS EPP TO INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE

OCA/BOOKSPAN-T2-7. Please turn to your testimony, Table 2, page 11. For each of the years FY 2006, FY2007, and FY2008 please indicate for the After Rate mailings how much of the New Membership Standard letter-size mail is mail which has been converted from New Membership Standard Flat-size mail and how much of the New Membership Standard letter-size mail is new mail which would not otherwise have been generated absent the implementation of the proposed NSA.

As I explained in my testimony, all of the potential campaigns for 2006-2007 have not been planned in detail. However, the following is our best estimate:

After Rates	FY 2006	FY 2006	FY 2008
Letter Size mail converted from flats	17,000,000	19,000,000	20,000,000
Letter Mail which would not otherwise have been generated	10,000,000	11,000,000	12,000,000

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