

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 FOLLOW-UP  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-9-10)  
September 8, 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-9. Please refer to the response to POIR No. 2, Question 1(c), where it states, “Are Standard Mail solicitation letters sent to members of one book club to join another second (unrelated) book club eligible to be counted and potentially receive discounts under the terms of this agreement?’ The answer to that question is yes.” Also, please refer to the response of Bookspan witness Epp to POIR No. 2, Question 1(e), where it states, “Such a [Current Member solicitation mailing] may include inserts promoting another Bookspan club; regardless, a Current Member mailing would not be eligible for the NSA discount.” Please reconcile these two statements.

OCA/USPS-10. Please refer to the response of Bookspan witness Epp to POIR No. 2, Question 1(c) and (e).

- a. Please explain how the Postal Service will independently verify that a Current Member solicitation mailing containing “inserts promoting another Bookspan club” are not treated as a solicitation mailing eligible to be counted and potentially receive discounts under the terms of the NSA.
- b. Please explain the audit and compliance activities to be undertaken by the Postal Service with respect to the Bookspan NSA. Please provide the amount of time, and financial and other resources to be used by the Postal Service to audit and verify compliance with the terms of the Bookspan NSA.
- c. Please confirm that the Postal Service will provide as part of the data collection plan a monthly estimate of the amount of time spent on compliance activity and a description of the activities performed. If you do not confirm, please explain.