

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

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**RATE AND SERVICE CHANGES TO  
IMPLEMENT BASELINE NEGOTIATED  
SERVICE AGREEMENT WITH BOOKSPAN**

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**DOCKET NO. MC2005-3**

**RESPONSE OF WITNESS POSCH TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/BOOKSPAN-T1-5-7)**

**(September 21, 2005)**

Bookspan hereby provides the response of Witness Posch to Office of the Consumer Advocate interrogatories OCA/BOOKSPAN-T1-5 and OCA/BOOKSPAN-T1-6, filed September 6, 2005, and OCA/BOOKSPAN-T1-7, filed September 7, 2005. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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

**OCA/BOOKSPAN-T1-5.** Please refer to your response to OCA/USPS-T1-13(c). For 2004 and 2005 to date, please provide examples of every insert of a strategic business partner included in Bookspan's solicitation mailings.

Response:

As clarified by OCA/BOOKSPAN-T1-7, Bookspan understands these questions as requesting examples of New Member mailpieces. Bookspan is providing such representative examples of New Member mailpieces as are readily available as a Library Reference (BOOKSPAN-LR-1). New Member mailings with inserts were conducted only as a test, and complete mailpiece examples that include the actual inserts are not readily available. The inserts vary as to content, but representative examples are included in the form of printouts of PDF files. Once printed, an insert would be enclosed in a mailpiece comparable to the letter-sized pieces included in the Library Reference.

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**OCA/BOOKSPAN-T1-6.** Please refer to your response to OCA/BOOKSPAN-T1-1, where you give examples of negative option marketers. Please provide the number of negative option marketers that operate pursuant to the Federal Trade Commission's Negative Option Rule.

Response:

Bookspan does not have this information.

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**OCA/BOOKSPAN-T1-7.** Please refer to interrogatory OCA/Bookspan-T1-5. Please interpret the request made for “examples” to mean the entire mailpiece as it was mailed to prospective customers, including the strategic business partner insert, Bookspan’s solicitation material, and any other material contained in the mailpiece.

Response:

See the response to OCA/BOOKSPAN-T1-5.