

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

Postal Rate Commission  
Submitted 11/1/2005 10:19 am  
Filing ID: 47279  
Accepted 11/1/2005

Rate and Service Changes To Implement  
Baseline Negotiated Service Agreement With  
Bookspan

Docket No. MC2005-3

**NEWSPAPER ASSOCIATION OF AMERICA  
COMMENTS ON OFFICE OF THE CONSUMER ADVOCATE  
SUGGESTION RE BRIEFING SCHEDULE  
November 1, 2005**

The Newspaper Association of America (“NAA”) hereby submits comments on the Office of the Consumer Advocate’s notice of its decision not to file a direct case, and its suggestion as to the due date of briefs in this proceeding.

In its notice, OCA suggested that initial briefs be filed by November 10 and reply briefs by November 21. These are, of course, much earlier dates than in the current procedural schedule, which had contemplated the filing of direct cases by intervenors.

NAA does not oppose accelerating the briefing schedule. However, the November 10 date suggested by the OCA (and the November 14 date now suggested by Bookspan with the concurrence of the Postal Service) may be difficult for NAA to meet due to scheduling conflicts among those within the association who internally review the filing. These conflicts are exacerbated by the intervening Veterans Day holiday.

NAA respectfully agrees with the suggestion of Val-Pak that a longer period be allowed, such as three weeks from the issuance of the notice setting the briefing

schedule. NAA has no view regarding the scheduling of the reply brief and does not currently anticipate difficulties in meeting whatever schedule is set for that filing.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker  
William B. Baker  
WILEY REIN & FIELDING LLP  
1776 K Street, N.W.  
Washington, DC 20006-2304  
(202) 719-7255

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

November 1, 2005

William B. Baker  
William B. Baker