

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

Postal Rate Commission  
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Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
SATURATION MAILERS COALITION  
WITNESS PETE GORMAN  
(NAA/SMC-T1-1-6)  
October 4, 2006**

The Newspaper Association of America hereby submits the attached interrogatories to Saturation Mailer Coalition witness Pete Gorman (SMC-T-1) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

By: William B. Baker  
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**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.

October 4, 2006

William B. Baker  
William B. Baker

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NAA/SMC-T1-1: Please refer to your testimony at page 2, lines 2 through 9.

Is it the position of the SMC that if the Postal Service does not offer a “simplified but certified” addressing method on city delivery routes, the Commission should reject the Postal Service’s proposed DAL surcharge?

NAA/SMC-T1-2: Please provide a full description of the “simplified but certified” addressing method that your testimony advocates for city routes. In particular, please describe:

- a. What “certified” means, and in what manner would certification be done;
- b. All eligibility criteria that SMC advocates for “simplified but certified” mail;
- c. How requests not to mail would be handled;
- d. How “stop mail” orders issued pursuant to 39 U.S.C. §3008(b) would be honored;
- e. How mailers would ensure their compliance with the Deceptive Mail Prevention and Enforcement Act?

NAA/SMC-T1-3: Please describe your understanding of the term “saturation mail industry” as you use it in your testimony. In particular, indicate whether the following categories of businesses are part of the “saturation mail industry”:

- a. Saturation mailers that do not use DALs.
- b. Saturation letter mailers.
- c. High-density mailers of advertising from retailers, service companies, and entrepreneurs.

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- d. Private delivery firms that make no use of mail.
- e. Private delivery firms that make limited use of mail.
- f. Newspapers.
- g. Cable television systems.
- h. Broadcast stations.
- i. Local retailers and service companies.
- j. "Shopper" publications that publish relatively little or no editorial content.
- k. The Postal Service.

SMC-T1-4: Please provide data supporting your statement (at page 4, line 13-15) that "More than half of all shopper publications in the nation are delivered privately, outside the mailstream."

SMC-T1-5: Do you consider shopper publications that are available in a stack or a box at, for example, a grocery store, to be "privately delivered" as you use the term in your testimony? If so, please indicate what proportion such distribution comprises of the total distribution of shopper publications.

SMC-T1-6: Please refer to page 8, lines 16-21, of your testimony, where you state that a surcharge alone will not reduce the number of DALs in the system. Is it your testimony that the DAL surcharge will not induce any mailers to convert from DAL addressing to on-piece addressing?