

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  
INTERROGATORY TO UNITED STATES POSTAL SERVICE  
WITNESS MICHELLE K. YORGEY  
(OCA/USPS-T2-20)  
September 7, 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 an interrogatory and request 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-T2-20. Please refer to your response to interrogatory OCA/USPS-T2-13.b.

What proof do you have that Bookspan did not plan to divert sums formerly spent on telephone solicitations to direct mail even without the NSA discount inducement?

Please explain fully.