

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 BOOKSPAN
WITNESS MATTHIAS EPP (OCA/BOOKSPAN-T2-17-18)
September 8, 2005

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits follow-up 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,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

901 New York Avenue, NW Suite 200
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6891
e-mail: costicher@prc.gov

OCA/BOOKSPAN-T2-17. Please refer to your response to POIR No. 2, Question 1(c), which addresses the last sentence of Question 1(c).

- a. For Fiscal Years 2002, 2003, 2004, and 2005 to date, please provide the volume of Current Member mailings and New Member mailings by letter-shape and flat-shape.
- b. For Fiscal Year 2005, please provide the projected volume of Current Member mailings and New Member mailings by letter-shape and flat-shape.
- c. For Fiscal Years 2006, 2007, and 2008, please provide the projected volume of Current Member mailings and New Member mailings by letter-shape and flat-shape.

OCA/BOOKSPAN-T2-18. Please refer to your response to POIR No. 2, Question 1(c).

- a. Please provide an example of a Current Member mailpiece to an inactive customer, a Current Member mailpiece to an inactive customer containing an insert promoting another Bookspan club(s), and a New Member mailpiece to an inactive customer.
- b. Please explain the difference (if any) between a New Member mailpiece and an “advance reenrollment solicitation.”