

**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

**RESPONSE OF WITNESS EPP TO REDIRECTED INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-20)**

(September 22, 2005)

Bookspan hereby provides the response of Witness Epp to Office of the Consumer Advocate interrogatory OCA/USPS-T2-20, filed September 6, 2005. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Matthew D. Field
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to Bookspan

RESPONSE OF BOOKSPAN WITNESS EPP TO REDIRECTED INTERROGATORY
OF THE OFFICE OF THE CONSUMER ADVOCATE

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.

Response:

Budgets have been cut across marketing media. The decision to eliminate telemarketing was not the sole cause of these budget cuts. The decisions to cut the budgets were based on specific profitability goals, and campaigns that were expected to be less profitable were cut across all media.