

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

Postal Rate Commission  
Submitted 8/17/2005 12:08 pm  
Filing ID: 46473  
Accepted 8/17/2005

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

Docket No. MC2005-3

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS MICHELLE K. YORGEY  
(NAA/USPS-T2-1-3)  
August 17, 2005**

The Newspaper Association of America hereby submits the attached  
interrogatories to United States Postal Service witness Michelle K. Yorgey (USPS-T-2)  
and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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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.

August 17, 2005

William B. Baker  
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**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS **MICHELLE K. YORGEY**  
(NAA/USPS-T2-1-3)**

NAA/USPS-T2-1. Please refer to n.13 of your testimony, in which you state that the multiplier effect “is not relied upon in estimating the financial impact of the NSA on postal finances.” Please state why not.

NAA/USPS-T2-2: Please assume hypothetically that your Appendix A calculation remains as presented in your testimony but that the “multiplier effect” as described in the direct case of the Postal Service and Bookspan did not exist (i.e., that the financial impact of the “multiplier effect” is expected to be zero). Under these assumptions:

- a. Would you have recommended that the Postal Service sign the NSA?
- b. Would you testify that the Postal Rate Commission should approve the NSA?

NAA/USPS-T2-3. Although the Postal Service is not relying on the “multiplier effect” in its financial showing in this case, nonetheless has the Postal Service made any internal estimates of the amount of the “multiplier effect” that it expects from this NSA? Without discussing confidential information, please describe what, if any, such estimates have been made.