

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

Postal Rate and Fee Changes, 2006) Docket No. R2006-1

**FIRST INTERROGATORIES
OF THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
TO UNITED STATES POSTAL SERVICE WITNESS KIEFER
AAPS/USPS –T36-1-8
(July 6, 2006)**

Pursuant to Rules 25, 26 and 27 of the Rules of Practice, the Association of Alternate Postal Systems (AAPS) hereby submits interrogatories and requests for production of documents to United States Postal Service witness Kiefer. AAPS asks that, in responding to these requests, the Postal Service follow the guidelines set forth below. If any request is deemed burdensome or seeks information that the respondent reasonably believes is confidential, please contact the undersigned counsel for AAPS to discuss possible limitations or alternative requests.

If the witness to whom these interrogatories are directed is unable to provide a complete response, please provide a response by another witness, and if no such witness is capable of providing a complete response, please submit an “institutional” response. If an “institutional” response is provided, please provide the name or names of the persons responsible for the response.

If information requested is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available.

If a privilege or confidentiality is claimed with respect to any information that is responsive to these requests, please describe the precise nature of any privilege claimed and describe information being withheld, including sufficient detail to enable a reasonable assessment of the claim of privilege or confidentiality.

If any information that would have been provided in response to these requests has been destroyed, please describe such data or documents and explain the circumstances under which they were destroyed.

Respectfully submitted,

/s/ David R. Straus
David R. Straus
Bonnie S. Blair
Attorneys for Association of Alternative
Postal Systems

Law Offices of:

Thompson Coburn LLP
1909 K Street, NW
Suite 600
Washington, DC 20006-1167
(202) 585-6921

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AAPS/USPS-T36-1. Do you agree that, in designing rates for Standard mail, the Postal Service is required to consider the impact of changes in such rates on enterprises in the private sector engaged in the delivery of mail matter other than letters?

AAPS/USPS-T36-2. Please explain, in detail, how the Postal Service considered the impact of changes in the Standard, ECR saturation rates proposed in this case on enterprises in the private sector engaged in the delivery of mail matter other than letters.

AAPS/USPS-T36-3. Please confirm that from approximately 1993 through approximately 1999, the Postal Service engaged a consultant named SAI to study the structure, rates and/or services of the segment of the alternate delivery industry represented by AAPS here, that is, companies engaged primarily in the door-to-door delivery of advertising material, product samples and usually free newspapers. If you cannot confirm (after reviewing, if necessary, material submitted by AAPS and the Postal Service in Docket Nos. MC95-1, R97-1 and R2000-1), please explain why.

AAPS/USPS-T36-4. Has the Postal Service requested or received any studies of the alternate delivery industry since the 1999 update to the SAI report? If so, please describe such studies and provide copies of any reports or updates produced.

AAPS/USPS-T36-5. If the Postal Service has not requested any studies of the alternate delivery industry since the 1999 update to the SAI report, has it obtained similar information—that is, information on the rates and/or services offered by alternative delivery companies—since 1999? If so, please describe those efforts and provide copies of any reports, information or data that were generated.

AAPS/USPS-T36-6. In Docket No. R2000-1, USPS witness Moeller (T-35) testified, at pages 19-20, that in its proposal in that docket, the Postal Service addressed objections that had been raised by “private alternatives” in Docket No. R97-1 to the reduced pound rate proposed there. Has the Postal Service addressed those concerns here? If so, how. If not, why not?

AAPS/USPS-T36-7. What percentage of Standard, ECR Saturation pieces fall within the following weight ranges: 0-1 ounce, 1-2 ounces, 2-3 ounces, 3-4 ounces, 4-5 ounces, 5-6 ounces, 6 ounces or more?

AAPS/USPS-T36-8. Please explain the manner and the extent to which the Postal Service considered whether the proposed rates, which will increase for relatively lightweight Standard, ECR Saturation pieces with DDU entry and decrease for relatively heavy Standard Saturation pieces with DDU entry, will encourage movement from stand-alone mailings into multi-piece shared mail and the revenue/contribution implications to the Postal Service of such movement.