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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

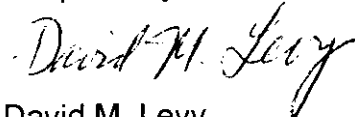
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Docket No. R2000-1
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Postal Rate and Fee Changes, 2000
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**FIRST INTERROGATORIES OF AMERICAN LIBRARY ASSOCIATION
TO USPS WITNESS KIEFER (ALA/USPS-T37-1-6)**

Pursuant to section 20 of the Commission's Rules of Practice, the American Library Association ("ALA") respectfully submits the attached interrogatories and document requests to USPS witness James M. Kiefer (USPS-T-37). ALA incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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February 16, 2000

QUESTIONS

ALA/USPS-T37-1. This question refers to page 23 of your testimony, where you state that “the Postal Service anticipates the adoption of legislation that will codify the principles followed in this rate case to develop Library Mail rates when preferred rates cannot be achieved using the cost coverage formula described in RFRA.” Please confirm that the Commission cannot both accept the Postal Service’s cost estimates and recommend the Postal Service’s proposed rates unless Congress changes the law. If you fail to confirm, please explain fully.

ALA/USPS-T37-2. Please produce a table showing the rate changes for Library Rate mail that would follow from the Postal Service’s proposed cost estimates if the existing statutory constraints on Library rates remain unchanged. Please use a format comparable to the rate schedule appearing in the Postal Service’s Request at Attachment B, page 52.

ANM/USPS-T37-3. Does the Postal Service contend that its Rate Request and supporting documentation provide an adequate basis for the Commission to recommend rates for Library mail if the existing statutory constraints on preferred rates remain unchanged?

(a) If so, please produce a table, in a format comparable to page 52 of Attachment B to the USPS Request, showing the rates that the Postal Service believes could be lawfully recommended by the Commission.

(b) If not, please specify in detail what must be added to the Postal Service’s filing before the Commission can lawfully recommend rates under the existing statutory constraints.

ALA/USPS-T37-4. In the Postal Service's view, what characteristics of Library Rate mail cause its unit costs to exceed those of Special Standard Mail? Produce all studies, analyses and similar documents that support your answer.

ALA/USPS-T-37-5. Please identify each characteristic of Library Rate mail that the Postal Service has studied, investigated or analyzed since Docket No. R97-1 as a possible cause of the relatively high unit costs attributed to the subclass by the Postal Service. Produce all documents relating to each such study, investigation or analysis.

ALA/USPS-T37-6. Please produce all memoranda, correspondence or other communications created by in-house or outside economists, cost analysts or consultants for Postal Service headquarters since July 1, 1998, concerning possible causes of the relatively rapid cost increases attributed to Library rate mail by the Postal Service's costing systems.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



February 16, 2000