

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

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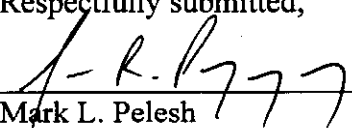
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**FIRST INTERROGATORY OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS KINGSLEY AAP/USPS-T10-1-1)**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publishers (AAP), hereby submits the following interrogatory and request for production of documents to USPS witness Kingsley (USPS-T-10). AAP incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed January 24, 2000). If the designated witness is unable to respond to the interrogatory, or any part therein, we request a response by some other qualified witness.

Respectfully submitted,

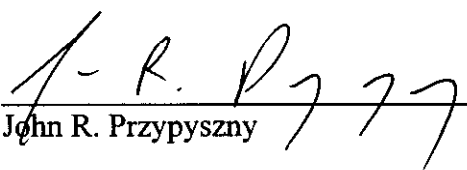


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding.



John R. Przepyszny

Date: February 22, 2000

**INTERROGATORY OF ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

AAP/USPS-T10-1 On page 25 of your testimony, you describe as an “inefficiency” the following example: “Bound Printed Matter (BPM) at the local rate might be dropped at a Main Post Office (MPO) for local delivery, but it would not be distributed from the MPO directly to stations and branches. Instead, the BPM for the stations and branches is trucked to the plant for distribution. The inefficiency caused by the drop at the MPO is compounded if the drop at the MPO includes mail that its outside of the plant’s service area, so that the plant must ship it on to the appropriate destinating plant.” With respect to this statement:

(a) Please provide all studies, reports, data or other evidence that you relied upon that demonstrates that this example actually does, in fact, occur for BPM and that the example occurs with any frequency.

(b) Please provide any internal reports or analyses of any kind prepared that address the cost consequences of this alleged “inefficiency” for BPM mail.

(c) Please provide any studies, reports, data or other evidence that you relied on showing the frequency of drops of BPM mail outside of the plant’s service area.

(d) Please state the number and location of each MPO where this alleged inefficiency actually did occur and the number and location of all plants to which the BPM mail in question then had to be trucked for distribution. Explain how these counts were derived.

(e) Please state the volume of BPM mail for which this alleged inefficiency actually did occur. Explain how this volume count was derived.