

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

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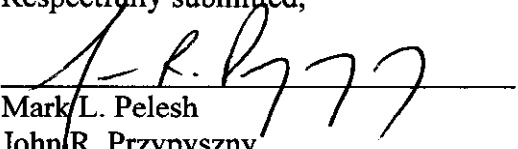
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**FIRST SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS CRUM (AAP/USPS-T27-1-12)**

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 interrogatories and request for production of documents to USPS witness Crum (USPS-T-27). 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 any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

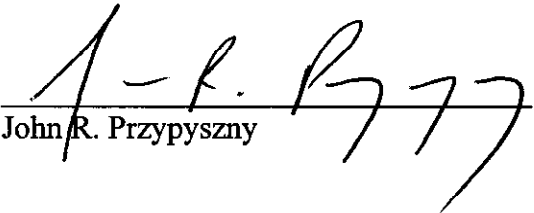


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CERTIFICATE OF SERVICE

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 23, 2000

**INTERROGATORIES OF ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS CRUM**

AAP/USPS-T27-1 On page 1 of your testimony (lines 10-12), you state that USPS-LR-109 was prepared by you or under his supervision. With respect to this statement:

(a) Please provide a full description of your personal involvement in the preparation of LR-109.

(b) Describe the full nature of his activities in preparing any survey forms used to produce LR-109 and in supervising the work needed to complete USPS-LR-109.

AAP/USPS-T27-2 On page 13 of your testimony (lines 9-11), you state that “Because of its zoned nature and local/non-local rates, Bound Printed Matter is already entered fairly deep into the system. However, mail is often entered in ways that are inconsistent with current Postal operations.” With respect to this statement:

(a) Please explain whether the entry of BPM in ways that are inconsistent with “current” postal operations was ever consistent with postal operations in any past periods.

(b) If these entry practices had been consistent with postal operations in the past, please explain the nature and timing of the changes in postal operations that rendered these entry practices inconsistent with current postal operations.

AAP/USPS-T27-3 On page 13 of your testimony (lines 15-16), you state that “...Local pieces can have higher costs than similar non-local pieces.” With respect to this statement, please provide a detailed example of the most likely situation where local BPM pieces can have higher costs than similar non-local BPM pieces. Please identify and provide all studies, reports, data or other evidence that you relied upon to provide the example.

AAP/USPS-T27-4 On page 13 of your testimony (lines 17-19) you state that “mail is sometimes entered at facilities geographically close to, but outside of the destinating service area of the piece.” With respect to this statement, please define the destinating service area and explain whether, the destinating service area would generally be inside or outside the BPM local zone boundary determined by the USPS.

AAP/USPS-T27-5 On page 14 of your testimony (lines 2-4), you state that “Dropship discounts have proven to be popular and appropriate in Periodicals, Standard Mail A, and Standard Mail B Parcel Post.” With respect to this statement, please state whether any similar

“local” rate zones were eliminated when drop ship discounts were introduced in each of these subclasses.

AAP/USPS-T27-6 On page 14 (lines 21-23) and page 15 (line 1) of your testimony, you state “[b]eing consistent with the Postal Service’s volume variability assumptions in this case, I estimate that DBMC Bound Printed Matter will save \$.380 relative to non-DBMC entered pieces at Test Year 2001 cost levels. Please explain, in detail, how the cost savings for DBMC-entered BPM is “consistent with the Postal Service’s volume variability assumptions in this case.”

AAP/USPS-T27-7 In footnote 1 of Attachment I, Table 2 of your testimony you refer to “Handbook F-45, Appendix B, page 2.” Please provide a copy of this reference.

AAP/USPS-T27-8 Following Attachment H, Table 2 of your testimony is a document entitled “Appendix H, Table 2.1” which contains certain figures without column headings. Please provide a corrected version of “Appendix H, Table 2.1” that includes column headings and make any other required corrections to this Table.

AAP/USPS-T27-9 Please explain the differences between the “Mail Processing Version” of Attachment H (Table 1) and the “Transportation Version” of Attachment H (Table 2). Why are the survey results different for the two versions?

AAP/USPS-T27-10 With respect to the entry profiles shown for BPM on Attachment H of your testimony, please list and explain each BPM entry profile which, in your view, is no longer consistent with current postal operations.

AAP/USPS-T27-11 With respect to Table 3 of Attachment H of your Testimony (Simplified Standard Mail (B) Mailflow), please show where BPM mail that is now shipped at local zone rates generally would enter the mail flow as described by the Table.

AAP/USPS-T27-12 In Attachment J, Table 1.4 of your testimony, you provide a reference for column 8 stating “[p]ieces per container in Docket No. R84-1.” Please provide this reference from Docket No. R84-1 and state when it was developed. In addition, please explain: a) why this reference is not outdated and b) the basis for relying upon results from Docket No. R84-1 in this proceeding.