

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

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POSTAL RATE AND FEE CHANGES, 2000)
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS BY THE ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS TO THE UNITED STATES POSTAL
SERVICE WITNESS SHARON DANIEL
(AAPS/USPS-T28-1-5)**

Pursuant to the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatories and requests for production of documents to the United States Postal Service witness Daniel. If any request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

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Counsel for the Association
of Alternate Postal Systems

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

Bonnie S. Blair
Bonnie S. Blair, Esq.

Dated: February 23, 2000

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS (AAPS)
TO THE UNITED STATES POSTAL SYSTEM
WITNESS SHARON DANIEL (USPS-T-28)
(AAPS/USPS-T28-1-5)

AAPS/USPS-T28-1. At page 3, lines 26-27 of your testimony, you indicate that, besides weight, "shape, origin/destination combination, cube and level of presorting and dropshipping of mail can affect the cost of mail." Can the degree to which mail is bound or loose also affect costs? In other words, holding everything else constant, is it more costly to handle an eight-ounce bound catalog or an eight ounce shared mail set with numerous coupons and single sheets of glossy paper inside a folded supermarket brochure? Has the Postal Service studied this issue? If so, please provide a copy of the study.

AAPS/USPS-T28-2. You state at page 4, line 8, that the weight study methodology "involves every major cost component." Did the Postal Service actually study the effect of weight on every major cost component, or was the effect simply assumed as to some. If the effect on some cost components was assumed, which ones?

AAPS/USPS-T28-3. Please explain, with references to your testimony or to the testimony of other Postal Service witnesses, any new studies or initiatives undertaken since Docket R97-1 to study the effect of weight on costs other than in-office costs—specifically on carrier street time.

AAPS/USPS-T28-4. Beginning at page 8, you discuss cost segment 7.

(a). Please confirm that, for cost segment 7.1, Route Time, the Postal Service simply assumed that weight would not affect costs. If you do not confirm, please explain how the effect of weight was studied.

(b). Please confirm that, for cost segment 7.2, Access Time, the Postal Service simply assumed that weight would not affect costs. If you do not confirm, please explain how the effect of weight was studied.

(c). Please expand on your explanation at pages 8-9 that, for cost segment 7.3, Elemental Load, costs were allocated "on the basis of weight within shape...."

(d). Please explain in greater detail what you mean at page 9, lines 3-6, when you say that for cost segment 7.4, Street Support, costs are distributed to weight in proportion to the sum of costs in segments 6.1 through 7.3. Does this mean that to the extent that weight in assumed not to affect those segments, that assumption is carried forward into segment 7.4?

AAPS/USPS-T28-5. Assume that a carrier has 500 stops on her route and a saturation ECR piece to deliver to each stop every day, in addition to an assortment of other mail (including, perhaps, other saturation pieces). Assume further that on three days the saturation piece weighs one ounce and on three days the saturation piece weighs ten ounces. Please explain with reference to each of the out-of-office functions of the carrier and support personnel whether the

costs will vary depending upon whether the piece weighs one ounce or ten ounces. If any other assumptions are necessary to respond to this question, please provide reasonable assumptions.