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

Mar 7 4 11 PM '00

POSTAGE ATTEMPT OF THE OFFICER

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

## FIRST SET OF INTERROGATORIES OF MAIL ORDER ASSOCIATION OF AMERICA TO USPS WITNESS MOELLER (MOAA/USPS-T35-1-4)

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of America (MOAA), submits the following interrogatories to USPS witness Moeller (USPS-T-35).

Respectfully submitted,

David C. Todd

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## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

David C. Todd

Date: March , 2000

## INTERROGATORIES OF MAIL ORDER ASSOCIATION OF AMERICA TO UNITED STATES POSTAL SERVICE WITNESS MOELLER

MOAA/USPS-T-35-1 Do you agree that a failure to pass through to mailers 100 percent of cost savings resulting from destination entry inevitably results in rates that are less economically sound? If you disagree please explain your answer fully.

MOAA/USPS-T-35-2 Is it not also true that anything other than a complete pass through of Postal Service cost savings resulting from destination entry results in a false price signal to mailers? If your answer is anything other than a unqualified yes, would you please explain fully?

MOAA/USPS-T-35-3 Is it a correct reading of your testimony as found on pages 19-23 that the pound rates proposed by the Postal Service are still too high, i.e. that the increase in costs resulting from increased weight are less than the increase in rates resulting from increased weight?

MOAA/USPS-T-35-4 Please provide the Postal Services after rates volume estimates for both piece rated and pound rated non-letters, respectively, entered at the basic, high density and saturation levels.