

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

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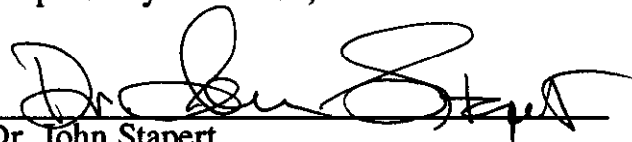
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

COALITION OF RELIGIOUS PRESS ASSOCIATIONS
FIRST INTERROGATORIES
TO POSTAL SERVICE WITNESS GEORGE S. TOLLEY (CRPA/USPS-T6-1-4)
(March 1, 2000)

Pursuant to Commission's Rules of Practice, the Coalition of Religious Press Associations (CRPA) hereby submits interrogatories to USPS Witness Tolley. If necessary, please redirect any interrogatory to a more appropriate Postal Service witness.

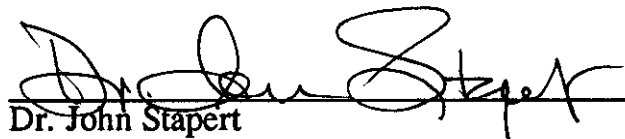
Respectfully submitted,



Dr. John Stapert
Coalition of Religious Press Associations
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above-named document upon all parties of record in this proceeding in accordance with Section 12 of the Rules of Practice.



Dr. John Stapert

March 1, 2000

CRPA/USPS-T-6-1

Please refer to page 84 of your testimony where you write, "Periodicals are given expeditious distribution, dispatch, transit handling and delivery, preceded only by First-Class, Priority Mail and Express Mail." Please provide evidence to support this claim, showing that the Postal Service's implementation of its "expeditious treatment" (a) compares favorably with its own service standards pertaining to the delivery of periodicals-Class mail and (b) compares favorably with Standard-A mail.

CRPA/USPS-T-6-2

Please refer to your testimony on page 96 where you present a volume forecast for periodicals nonprofit mail. You acknowledge that "the Base Year rates are a mix of R97-1 rates and the rates that prevailed before R97-1 took effect." The impact of new postal rates upon periodicals volume is, as you know, typically delayed because subscriptions sold under the prior rates have several months to run before they expire. And only later, when those subscriptions are renewed, do they include the cost of increased postage.

When you combined partial-year data from each portion of the Base Year (i.e. a before-R97-1 portion and a post-R97-1 portion) to calculate this forecast, did you allow for the delayed impact of new rates on periodicals due to the fact that the existence of subscriptions defers the impact of new rates on postal volumes?

CRPA/USPS-T6-3

Please refer to page 103 of your testimony where you recognize the impact of wholesale pulp and paper prices on the volume of regular-rate periodicals mail. Why is no comparable recognition of the impact of wholesale pulp and paper prices to be found in your analysis of factors which affect the volume of nonprofit periodicals mail?

CRPA/USPS-T-6-4

Please refer to Chart F (p. 111) and to Chart G (p. 137) of your testimony. Over the span of twelve years (1988 - 1999) regular-rate, non-carrier-route, bulk mail has become increasingly automated, reaching a high of 83.6% automated in 1999. Only about one-sixth of this mail remains nonautomated.

Over the same period nonprofit, non-carrier-route, bulk mail has also become more automated, but at a slower pace. In 1999, almost one-third of nonprofit, non-carrier-route, bulk mail remained nonautomated. Can you identify any factors which would account for the slower implementation of automation for nonprofit, Standard A mail as compared to regular-rate, Standard A mail?