

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

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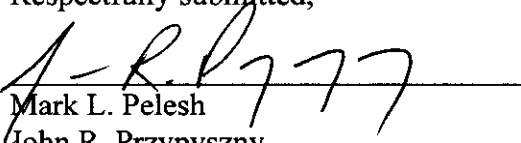
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**THIRD SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS KINGSLEY AAP/USPS-T10-13-15**

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 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 any 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.

Date: March 14, 2000


John R. Przepyszny

**THIRD SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

AAP/USPS-T10-14 Please refer to your response to AAP/USPS-T-10-1(a). Please confirm that, other than Attachment H to the testimony of Postal Service witness Crum (USPS-T-27) and the data supporting that attachment, the Postal Service has no other “studies, reports, data or other evidence” that proves the existence of the inefficiency claimed for BPM. In addition, please confirm that, other than Attachment H of witness Crum’s testimony and the data supporting that attachment, the Postal Service has no other “studies, reports, data or other evidence” that quantifies the frequency that this alleged inefficiency claimed for BPM actually occurs.

AAP/USPS-T10-15 Please refer to your response to AAP/USPS-T-10-1(e). In your response you state that data from Attachment H to the testimony of witness Crum was “inflated, combined, and extrapolated to the total FY 98 volume.” With respect to this statement, please explain in detail how data collected during FY 99 was “extrapolated to FY 98 volume.” Please provide overall BPM volume figures for FY 98 and for FY 99 and explain how differences between these volume levels were assigned to the destination entry categories that appear in Attachment H of witness Crum’s testimony.