

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

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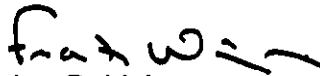
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KIEFER
(PostCom/USPS-T-37-1)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kiefer: PostCom/USPS-T-37-1. 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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PostCom/USPS-T-37-1. Please refer to Table 16 on Page 41 of your testimony and lines 19-22 of page 40, where you describe Table 16, "Table 16, adapted from my workpaper WP-BPM-16 shows my proposed adjusted rate elements for Single Piece and Presort Bound Printed Matter, including proposed rates for Carrier Route Presort and DBMC, DSCF and DDU rates."

(a) Please confirm that the rates in Table 16 form the basis for your Bound Printed Matter rate proposal. If not confirmed, please explain.

(b) Please provide the per-piece Basic Presort - Origin Entry cost savings, our proposed passthrough of this savings, and the proposed per-piece Basic Presort - Origin Entry discount that underlies your final rate proposal.

(c) Please provide the per-piece Carrier Route - Origin Entry cost savings, your proposed passthrough of this savings, and the proposed per-piece Carrier Route - Origin Entry discount that underlies your final rate proposal.

(d) Please provide the per-piece DBMC cost savings, your proposed passthrough of this savings, and the proposed per-piece DBMC discount that underlies your final rate proposal.

(e) Please provide the per-piece DSCF cost savings, your proposed passthrough of this savings, and the proposed per-piece DSCF discount that underlies your final rate proposal.

(f) Please provide the per-piece DDU cost savings, your proposed passthrough of this savings, and the proposed per-piece DDU discount that underlies your final rate proposal.

(g) Please provide the same information as requested in parts (a)-(f) of this interrogatory for every per-pound discount underlying the rates in Table 16.

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.



Ian D. Volner