

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

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POSTAL RATE COMMISSION  
DOCKET NO. R2000-1

**SECOND SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS BY THE ASSOCIATION OF  
ALTERNATE POSTAL SYSTEMS TO THE UNITED STATES POSTAL  
SERVICE WITNESS VIRGINIA J. MAYES  
(AAPS/USPS-T32-13-19)**

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 Mayes. 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  
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**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: March 16, 2000

SECOND INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS  
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS (AAPS)  
TO THE UNITED STATES POSTAL SERVICE  
WITNESS VIRGINIA J. MAYES (USPS-T-32)  
(AAPS/USPS-T32-13-19)

AAPS/USPS-T32-13. At the time that you responded to AAPS/USPS-T32-1, in which you stated that you have not read the SAI study that was the subject to controversy in Docket No, MC95-1, were you aware that (as revealed in the Postal Service's March 6<sup>th</sup> Objections) that there was a 1998 "revision" to that report?

AAPS/USPS-T32-14. Given the subject matter of your testimony, which addresses among other things the effect of the proposed rates on Postal Service competitors, please explain why you did not review that original SAI report, especially because in response to NAA interrogatory 19(b) you state that "details about competitors costs, prices and volumes...would be helpful in to guard against creating a harmful impact on competing firms."

AAPS/USPS-T32-15. The Postal Service has revealed in its March 6<sup>th</sup> Objections that it possesses both a 1998 revision to the original SAI report and a January 22, 1999 "assessment," again prepared by SAI, that addresses a private sector competitor for the carriage of saturation advertising mail.

(a) Had you been aware of either of these documents at the time you prepared your testimony?

(b) Had you read either of these documents at the time you prepared your testimony?

(c) If you had not read both of them, please explain why you hadn't?

AAPS/USPS-T32-16. You state in response to AAPS/USPS-T32-4 that other providers of delivery service are not required to reveal their cost structures, rate application, pricing and other practices. Isn't that why the Postal Service contracted with SAI for the various reports concerning other delivery services? Didn't other delivery services cooperate by providing information to SAI?

AAPS/USPS-T32-17. In AAPS/USPS-T32-5, we asked whether there can ever be unfair price competition if the price of a postal service covers its incremental costs and, if so, under what circumstances. Your response merely refers to your responses to AAPS interrogatory 4 and NAA interrogatory 32. We do not find the answers there, so please answer these questions directly.

AAPS/USPS-T32-18. In response to AAPS/USPS-T32-6(a), you state that there "may be other means" of delivering nonprofit ECR mail, such as flyers left on doorknobs. Isn't it true that, in fact, there are such means and that alternate delivery companies such as the members of AAPS do deliver material for non-profit entities?

AAPS/USPS-T32-19. AAPS/USPS-32-7 asked the extent to which you considered unit contribution to institutional costs in connection with your goal of reducing the ECR cost coverage. Your response merely refers to your response to NAA interrogatory 13. Please confirm that your use of per piece contributions was not associated with cost coverages or contributions of individual classes to institutional costs, but only for purposes of assuring overall breakeven. If you cannot confirm, please explain how you used unit contributions for the purpose of measuring the relative contributions of the various classes and subclasses.