

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

POSTAL RATE AND FEE CHANGES, 2000

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**SECOND SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS BY THE ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS TO THE UNITED STATES POSTAL
SERVICE WITNESS JOSEPH D. MOELLER
(AAPS/USPS-T35-11-14)**

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 Moeller. 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 SYSTEM
WITNESS JOSEPH D. MOELLER (USPS-T-35)
(AAPS/USPS-T35-11-14)

AAPS/USPS-T35-11. In response to AAPS/USPS-T35-1(d), you state that "small businesses" would likely have benefited from a decrease in the pound rate larger than that proposed.

(a) Will "small businesses" also benefit from the reduction proposed?

(b) Please confirm that one way for small businesses to benefit from the proposed reduction in the pound rate is that such reduction would reduce the postage on Saturation ECR shared mail pieces above five ounces and thus would permit such businesses to mail a piece weighing, for example, one ounce as part of a set and pay a portion of the pound rate, rather than mailing at the piece rates, which are being increased?

(c) Has the Postal Service estimated the extent to which the proposed rates will induce mailers who now mail "solo" or combined advertisements at the piece rates to change their strategy and become part of a shared mail set offered by a mailer such as ADVO?

(d) If the response to part (c) is in the affirmative, has the Postal Service calculated the cost and revenue impact of such changes? If so, please provide that estimate.

AAPS/USPS-T35-12. At the time that you responded to AAPS/USPS-T35-8, in which you stated that you have not read any updates to 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 6th Objections) that there was a 1998 "revision" to that report?

AAPS/USPS-T35-13. Given the subject matter of your testimony, which addresses among other things the impact of the reduced rate proposed for some ECR pieces on alternate delivery companies, please explain why you did not review either the original SAI report or the 1998 revision to that report.

AAPS/USPS-T35-14. The Postal Service has revealed in its March 6th Objections that it possesses a January 22, 1999 "assessment," again prepared by SAI, that addresses a private sector competitor for the carriage of saturation advertising mail.

(a) Were you aware of that assessment when you prepared your testimony?

(b) Had you read it before you prepared your testimony?

(c) Have you read it as of the date of your response to this interrogatory?