

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

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POSTAL RATE AND FEE CHANGES, 2000)
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Docket No. R2000-1

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 SHARON DANIEL
(AAPS/USPS-T28-6)**

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 Daniel. If any request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

Bonnie S. Blair

Bonnie S. Blair, Esq.
THOMPSON COBURN LLP
700 14th Street, N.W., Suite 900
Washington, D.C. 20005

Counsel for the Association
of Alternate Postal Systems

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

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS (AAPS)
TO THE UNITED STATES POSTAL SYSTEM
WITNESS SHARON DANIEL (USPS-T-28)
(AAPS/USPS-T28-6)

AAPS/USPS-T28-6. In response to AAPS/USPS-T35-4 (redirected from witness Moeller), you state that you cannot provide the requested information "at the requested rate category," which was saturation ECR, but you do provide information for ECR mail in general. For each of the cost segments identified in that response, please estimate whether the cost differential would be the same, smaller or larger if you were to respond with respect only to saturation ECR mail, and explain why. (For example, if as you state the difference in city delivery in-office cost for two 4-ounce pieces is 1.14 cents greater than for one 8-ounce piece, would that difference be the same, larger, or smaller for saturation mail, and why?)