

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

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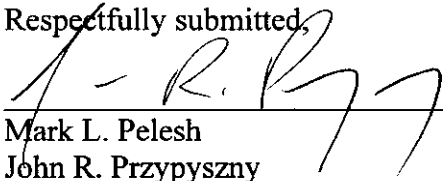
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**SECOND SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS TOLLEY (AAP/USPS-T6-19-20)**

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 Tolley (USPS-T-6). 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, 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 17, 2000



John R. Przypyszny

**INTERROGATORIES OF ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY**

AAP/USPS-T6-19 Please refer to your response to AAP/USPS-T6-1. With respect to your response:

- (a) Please confirm that other than the chart produced, you did not rely upon any study, report, data or other evidence to support your statement, on pages 167 and 168 of your testimony, that “[m]uch of this long-term growth in Bound Printed Matter (“BPM”) volume is due to the mail order boom and the expansion of the catalog industry.” Please explain any response which does not confirm this statement.
- (b) Please identify the underlying data and sources upon which you relied to create the chart attached to your response.
- (c) Please explain what, exactly, constitutes “mail-order retain sales” as that phrase is used in your response.

AAP/USPS-T6-20 Please refer to your response to AAP/USPS-T6-6. In your response you state that “the 1999 Household Diary is not available at this time.” With respect to this statement:

- (a) Please identify a date when the 1999 Household Diary will be available.
- (b) Please provide any preliminary data from the 1999 Household Diary study which addresses or pertains to the volume of the Bound Printed Matter (“BPM”) subclass which consists of books.
- (c) Please provide the 1999 Household Diary when it becomes available.