

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

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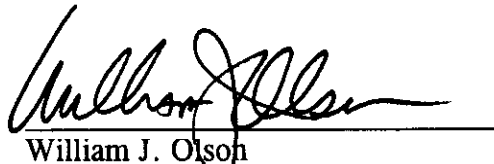
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.
FOURTH INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS MAURA ROBINSON (APMU/USPS-T34-44-52)
(March 22, 2000)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, the Association of Priority Mail Users, Inc. ("APMU") hereby submits the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

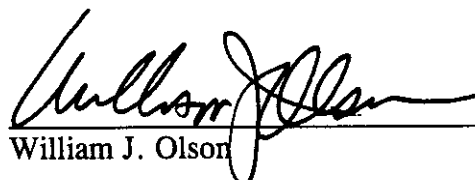
McLean, Virginia 22102-3860

(703) 356-5070

Counsel for Association of Priority Mail Users, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

March 22, 2000

APMU/USPS-T34-44.

Please refer to your response to APMU/USPS-T34-18(f), where you state that you consulted with persons assigned responsibility for marketing Priority Mail during your assessment of its competitive situation before finalizing your proposed rate design for Priority Mail.

- a. In your consultations with persons responsible for marketing Priority Mail, did you discuss the impact of imposing a 20-plus percent increase on the “weight step with the largest volume” (*see* response to APMU/USPS-T34-30), which represents over 39 percent of anticipated TYAR volume (the sum of flat rate and 2-pound volumes taken from Attachment D, even after 1-pound volume is removed)? (i) If so, were any concerns raised about the impact of this rate increase by marketing staff? Did you communicate any such concerns to witness Mayes, and, if so, did you take any actions in response to the concerns that were raised? (ii) If not, why not?
- b. Please refer to your response to APMU/USPS-T34-17(a). Did you discuss with marketing staff the impact of across-the-board double-digit increases on a product whose market share by volume fell in CY 1999 to its lowest level of the decade? (i) If so, what concerns were raised about the impact of these rate increases by the marketing staff? Were any actions taken in response to the concerns raised? (ii) If not, why not?
- c. Please provide a summary of your consultations with persons responsible for marketing Priority Mail. Include in your summary the number of such people

consulted, the approximate number of hours which you devoted to such consultations.

- d. Please explain your understanding regarding changes in the competitive environment for expedited 2-day package service (*i.e.*, the market in which Priority Mail competes) since the Base Year in Docket No. R97-1.

APMU/USPS-T34-45.

Please refer to your response to APMU/USPS-T34-25.

- a. Please identify in detail how (i) mail processing, (ii) transportation, and (iii) delivery provided to Priority Mail reflect greater expedition than is provided to First-Class Mail. Please discuss actual practices as well as service standards. For each function for which you maintain that Priority Mail receives more expedited handling than First-Class Mail, please provide copies of all documents, instructions, or other evidence upon which you rely to support your position.
- b. In those Postal Services facilities that process both First-Class Mail and Priority Mail (*i.e.*, not within the PMPC network area), is it your understanding that Priority Mail is processed ahead of First-Class Mail? Is it your understanding that Priority Mail has dispatches that precede those for First-Class Mail?

APMU/USPS-T34-46.

Please refer to your response to APMU/USPS-T-34-30. What possible significant changes to the PMPC network have you been informed of?

APMU/USPS-T34-47.

Please refer to your response to APMU/USPS-T-34-16(c).

- a. How much variance would there likely be between the elasticity for Priority Mail, and the elasticity for the rate cell which reflects 80 percent of Priority Mail Base Year volume?
- b. How much more difficult would it be to estimate the elasticity of the rate cell which reflects 80 percent of Priority Mail Base Year volume, and the elasticity for all Priority Mail?

APMU/USPS-T34-48.

Please refer to your response to APMU/USPS-T-34-17.

- a. Please provide comparable data for CY 1997.
- b. Please provide complete data for CY 1999 as soon as available.

APMU/USPS-T34-49.

Please refer to your response to APMU/USPS-T-34-28.

- a. When did testing of Priority Mail delivery confirmation begin with selected mailers?

- b. When did the electronic version of Priority Mail delivery confirmation become generally available?
- c. When did the manual version of Priority Mail delivery confirmation become available?
- d. Please provide data of delivery confirmation usage by A/P for PFY 1999.

APMU/USPS-T34-50.

- a. Under the PMPC network contract with Emery, what payments for FY 1998 were called for in the original contract? Please explain if payments were fixed, variable, or per piece.
- b. What was the total amount of money paid to Emery for FY 1998?
- c. Please identify all claims or other adjustments by Emery still outstanding for FY 1998?
- d. For those additional FY 1998 amounts paid to Emery over and above the amount stipulated in the original contract. Please set out the amount and justification for each payment.

APMU/USPS-T34-51.

- a. Under the PMPC network contract with Emery, what payments for FY 1999 were called for in the original contract? Please explain if payments were fixed, variable, or per piece.
- b. What was the total amount of money paid to Emery for FY 1999?

- c. Please identify all claims or other adjustments by Emery still outstanding for FY 1999?
- d. For those additional FY 1999 amounts paid to Emery over and above the amount stipulated in the original contract. Please set out the amount and justification for each payment.

APMU/USPS-T34-52.

For FY 1997, FY 1998 and FY 1999, please provide ODIS (Origin/Destination Information System) data regarding First-Class Mail and Priority Mail that shows the percentage of each which meets its respective overnight, 2-day, and 3-day standard.