

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

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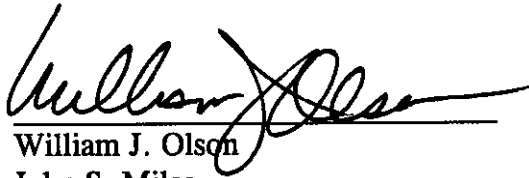
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.
FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO UNITED STATES POSTAL SERVICE
WITNESS NANCY R. KAY (APMU/USPS-T23-1)
(March 23, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Association of Priority Mail Users, Inc. hereby submits interrogatories and requests for production of documents. If necessary, please redirect any interrogatories and/or requests to a more appropriate Postal Service witness.

Respectfully submitted,

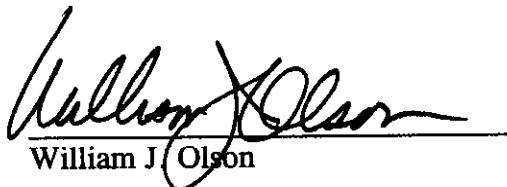


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CERTIFICATE OF SERVICE

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



William J. Olson

March 23, 2000

APMU/USPS-T23-1.

Please refer to witness Kashani's response to MPA/USPS-T14-2, both at pages 8-10 of the narrative response as well as Attachment I (Mail Processing Adjustment for Redistribution of Rehabilitation Program), pages 1-2. Witness Kashani explains that the costs associated with the Rehabilitation program "were erroneously distributed to Priority Mail in mail processing in FY 2000. This miscalculation overstates Priority Mail costs by approximately \$46 million in that year...." Witness Kashani then makes what he calls a "Priority Mail Correction," reducing Priority Mail costs by \$46.350 million. Please provide a similar correction to the incremental costs of Priority Mail.