

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

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POSTAL RATE COMMISSION
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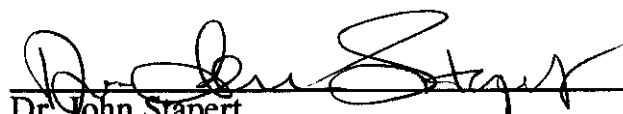
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

COALITION OF RELIGIOUS PRESS ASSOCIATIONS
FIRST INTERROGATORIES (FOLLOW-UP)
TO POSTAL SERVICE WITNESS THRESS (CRPA/USPS-T7-1-5)
(March 30, 2000)

CRPA respectfully submits the attached interrogatories and document requests (CRPA/USPS-T-7-1-5) to USPS Witness Thress (USPS-T-7). These interrogatories follow-up Witness Thress's responses to CRPA/USPS-T-6-2-4, which initially had been addressed to Witness Tolley.

Respectfully submitted,


Dr. John Stapert
Coalition of Religious Press Associations
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CRPA/USPS-T-7-1

In your response to CRPA/USPS-T-6-2, you stated that 94% of regular Periodical mail felt the impact of new rates two or more quarters after a rate change. You then stated that 40.8% of nonprofit Periodical mail felt the impact of changes two or more quarters after a rate change. What is the explanation for this large discrepancy?

CRPA/USPS-T-7-2

In your response to CRPA/USPS-T-6-4, you hypothesize that "One possible explanation for some of the difference in the amount of regular versus nonprofit mail that is automated is that automation discounts are somewhat lower for nonprofit mail than for regular rate mail."

- (a) If one subclass has lower piece distribution costs than another, is it not possible that the difference in costs would require a lower automation discount for the subclass with the lower piece distribution costs?
- (b) Does the Cost and Revenue Analysis Report for the Base Year show a difference in cost per piece between a nonprofit periodical and a regular-rate periodical?
- (c) Provide the same information provided in (b) above for each year from 1999 through the Test Year.

CRPA/USPS-T-7-3

You also state in your response to CRPA/USPS-T-6-4 that "Nonprofit mailers have higher costs associated with automation [than regular-rate mailers]".

What is the foundation for that assertion? Provide any studies, data or other information that USPS has that would substantiate your statement.

CRPA/USPS-T-7-4

Is it your understanding that most publishers, large or small, possess "automation equipment" (Response to CRPA/USPS-T-6-4)? If your answer is affirmative, what "equipment" are you talking about, and what is the evidence that validates your statement?

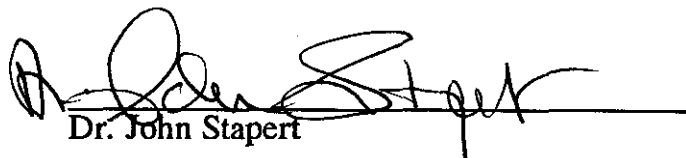
CRPA/USPS-T-7-5

- (a) What facts support your answer to CRPA/USPS-T-6-4, where you state that "It may be more difficult for nonprofit mailers to use presort bureaus, many of whom are heavy users of automation, than regular mailers."?

(b) Is it your opinion that larger-volume publications, e.g., over 200,000 copies per issue, are more likely or less likely to have "in-house" fulfillment departments than are smaller-circulation periodicals? What is the foundation for your response?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above-named document upon all parties of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Dr. John Stapert

March 30, 2000