

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

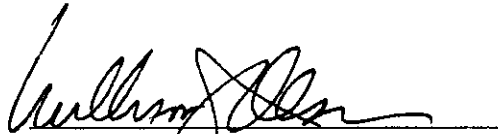
POSTAL RATE AND FEE CHANGES, 2000 )

Docket No. R2000-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.  
FIRST FOLLOW-UP INTERROGATORY AND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS LINDA A. KINGSLEY (APMU/USPS-T10-2)  
(March 31, 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

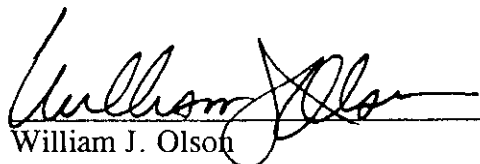
McLean, Virginia 22102-3860

(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 31, 2000

**APMU/USPS-T10-2.**

Please refer to your response to APMU/USPS-T10-1(d), where you state that “there has been measurable improvements in Priority service with the PMPCs compared to the rest of the network....”

- a. By “network,” do you mean something other than the PMPC network, such as all Priority Mail processing and transportation outside the PMPC network?
- b. Please provide all evidence supporting your statement.
- c. Please provide the data demonstrating these measurable improvements for:
  - (i) Priority Mail both originating and destinating within the network service area;
  - (ii) Priority Mail originating within and destinating outside the network service area;
  - (iii) Priority Mail originating outside and destinating inside the network service area; and
  - (iv) Priority Mail neither originating nor destinating within the network service area.
- d. Please reconcile your statement with the findings of the Postal Service Inspector General’s office, as reported in the Inspector General’s report, Priority Mail Processing Center Network (September 24, 1999) DA-AR-99-001.
- e. Were the data which you cite provided to the Inspector General? Please explain your answer.