

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

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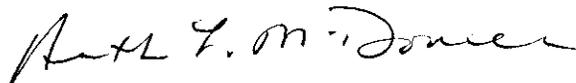
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS CRUM  
(PostCom/USPS-T-27-7)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Crum: PostCom/USPS-T-27-7. 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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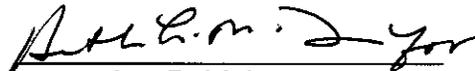
Counsel for Association for Postal Commerce

PostCom/USPS-T-27-7. Please refer to your response to AAP/USPS-T-27-10, in which you state that “[n]one of the entry points described [in Attachment H] are necessarily inconsistent with current postal operations.”

- a) Please confirm that Attachment H to your testimony reflects entry profile data for all bound printed matter (BPM) container types, including bedloaded bundles. If not confirmed, please explain the basis for excluding BPM bedloaded bundle data.
- b) Please confirm that mailer entry of bedloaded BPM is not “inconsistent with current postal operations.” If not confirmed, please explain the reasons and basis for your answer and provide copies of any studies, reports, assumptions, estimates, or analyses upon which you rely in formulating your response.
- c) Please explain the reasons and basis for your statement in Attachment J, Table 2.2, note [3]: “Bedloaded bundles excluded because assumed they will not be allowed in Test Year,” and provide copies of studies, reports, assumptions, estimates, or analyses upon which you have relied in making this statement.
- d) In response to PSA/USPS-T26-3, Witness Eggleston stated: “The estimated percentage of bedloaded DBMC mail that is used in my models is 96.2 percent.” Please state the percentage of BPM that is bedloaded when presented to the Postal Service. Please explain the reasons and basis for your response and provide copies of studies, reports, assumptions, estimates, or analyses upon which you have relied in formulating your response.
- e) Please state whether presentation by a mailer of bedloaded bundles of BPM at the (i) DBMC and (ii) DSCF will be eligible for the proposed new drop entry discounts for BPM. If your answer is no, please identify the container types that will be accepted. Please explain the reasons and basis for your answer(s) and provide copies of any studies, reports, assumptions, estimates, or analyses upon which you rely in formulating your response(s).

## CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

  
Ian D. Volner

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