

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

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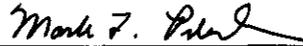
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**FOLLOW-UP INTERROGATORY OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS KINGSLEY AAP/USPS-T10-16**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publishers (AAP), hereby submits the following interrogatories and request for production of documents to USPS witness Kingsley (USPS-T-10). AAP incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed January 24, 2000). If the designated witness is unable to respond to any interrogatory, or any part therein, we request a response by some other qualified witness.

Respectfully submitted,

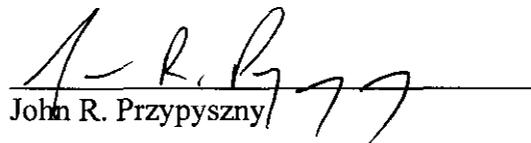


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding.



John R. Przepyszny

Date: April 4, 2000

**FOLLOW-UP INTERROGATORY OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

AAP/USPS-T10-16 Please refer to your response to AAP/USPS-T10-14. In your response you state that Attachment H to the testimony of Postal Service witness Crum and that data supporting that attachment are “not the only evidence that proves this inefficiency of the outdated local entry.” You also refer to information being provided on “numerous occasions” from customers that shows that they are depositing mail at facilities addressed to locations outside of that facility’s service area. Please provide all documents which represent the “evidence” referred to by your response and which support the alleged inefficiency for BPM. For purposes of your response, you do not need to provide Attachment H of witness Crum’s testimony or the Bound Printed Matter Study (USPS-LR-109) referred to in witness Crum’s testimony.