

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE ASSOCIATION OF AMERICAN PUBLISHERS
REDIRECTED FROM WITNESS KIEFER
(AAP/USPS-T37-23(a) (in part), 23(c))

The United States Postal Service hereby provides its responses to the following interrogatories of the Association of American Publishers: AAP/USPS-T37-15-23(a) (in part), 23(c), filed on March 21, 2000, and redirected to from witness Kiefer.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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April 4, 2000

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AAP/USPS-T37-23 Please refer to Table 14 found on page 31 of your testimony. With respect to Table 14:

- (a) Please identify the source of the BPM volume data shown in Table 14 of your testimony and identify all alternative sources for BPM volume data that are available to the Postal Service.
- (b) Please update Table 14 to reflect FY 1999 volume figures for BPM.
- (c) Please explain footnote 2 of Table 14 which states that "1998 is recast to account for a Parcel Post reclassification."

RESPONSE

- (a) Responded in part by witness Kiefer. ODIS is an alternative source for BPM volume.
- (b) Responded to by witness Kiefer.
- (c) Please refer to the responses of the United States Postal Service to PSA/USPS-T32-8, redirected from witness Mayes, and to UPS/USPS-T5-13, redirected from witness Hunter.

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.



Scott L. Reiter

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