

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

**COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ASSOCIATION OF ALTERNATE POSTAL
SYSTEMS REDIRECTED FROM WITNESS MOELLER
(AAPS/USPS-T35—9 AND 10)**

Pursuant to P.O. Ruling No. R2000-1/21, the United States Postal Service hereby provides compelled responses to the following interrogatories of Association of Alternate Postal Systems redirected from witness Moeller: AAPS/USPS-T35—9 and 10, filed on February 23, 2000. The responses reference USPS LR-I-268, which is filed today pursuant to the protective conditions of P.O. Ruling No. R2000-1/21.

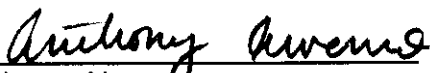
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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April 4, 2000

RESPONSE OF UNITED STATES POTSAI SERVICE TO INTERROGATORIES
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS REDIRECTED FROM
WITNESS MOELLER

AAPS/USPS-T35-9. Has the SAI Study been updated since the close of the record in Docket No. R97-1. If so, please make a copy of the study available.

RESPONSE:

The most recent version of the SAI study is provided in USPS LR-I-268, filed under protective conditions of P.O. Ruling No. R2000-1/21.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS REDIRECTED FROM
WITNESS MOELLER

AAPS/USPS-T35-10. Since the close of the record in Docket No. R97-1, has the Postal Service conducted or caused to be conducted any study of competition from the private sector for the carriage of saturation advertising material? If so, please make a copy of that study available. If there is such a study and the Postal Service intends once again to object to its release, in response to this question please provide the name and employer of the person or persons that conducted the study, a summary of its content and a copy of the study plan or outline of its scope.

RESPONSE:

See the second document provided in USPS LR-I-268, filed under protective conditions of P.O. Ruling No. R2000-1/21.

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.



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