

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

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS YACOBUCCI
(PostCom/USPS-T-25-9)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Yacobucci: PostCom/USPS-T-25-9. 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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PostCom/USPS-T-25-9. Please refer to witness Kingsley's response to Postcom/USPS-T-10-9 (f)-(i). In this response, witness Kingsley describes mail flows for letters with several types of address problems and indicates that the mail flow for flats with similar address problems would be similar although not exactly the same.

(a) For each mail flow described in witness Kingsley's response to Postcom/USPS-T10-9(f)-(g), please indicate whether the flats cost model contained in LR-I-90 explicitly models the mail flow or whether the model simply takes the cost resulting from the address problem into account through the use of a CRA adjustment factor.

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 Volner
Ian D. Volner