Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS ROBINSON TO INTERROGATORY OF ASSOCIATION OF PRIORITY MAIL USERS (APMU/USPS-T34-53)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatory of the Association of Priority Mail Users: APMU/USPS-T34-44-53, filed on March 23, 2000.

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

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 6, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON TO INTERROGATORIES OF THE ASSOCIATION OF PRIORITY MAIL USERS

APMU/USPS-T34-53.

Did you consider the development of a Priority Mail dropship discount for "open and distribute" mailpieces (sacks) sent to DSCFs or other postal facilities, which contain other classes of mail, and do not receive final delivery from postal carriers? If not, why not? If so, why was not such a discount included among your rate proposals?

RESPONSE:

Yes. Given the uncertainty surrounding the Priority Mail network and the potential impact of changes in that network on Priority Mail rates, the Postal Service decided not to propose any Priority Mail discounts in Docket No. R2000-1.

DECLARATION

I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

MAURA ROBINSON

Dated: 4.6.2000

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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 6, 2000