

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

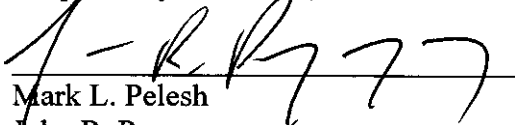
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000)

**FOLLOW-UP INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS DEGEN AAP/USPS-T16-10-11**

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 follow-up interrogatories and request for production of documents to USPS witness Degen (USPS-T-16). 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,

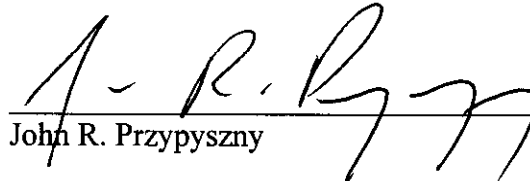


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CERTIFICATE OF SERVICE

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



John R. Przypyszny

Date: April 7, 2000

**FOLLOW-UP INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS DEGAN**

AAP/USPS-T16-10-11 Please refer to your response to subpart (c) of AAP/USPS-T17-9, (Redirected from Witness Van-Ty-Smith, USPS-T-17). With respect to the original interrogatory directed to Witness Van-Ty-Smith and your subsequent response to that interrogatory:

(a) Please provide a revised and detailed response which describes how the Postal Service made the determination that distribution of not-handled tallies to the BPM subclass (as opposed to other subclasses or all subclasses as whole) was based on a “reasonable inference.” Please provide all documents which show how this distribution was made and which support the “reasonable inference” made by the Postal Service.

(b) Please provide a detailed explanation and definition of the term “reasonable inference” as it pertains to the determination of the distribution of mixed tallies and not-handled tallies by the Postal Service.

AAP/USPS-T16-10-12 Please refer to your response to AAP/USPS-T17-12. Please confirm that no studies, reports, data, documents or other evidence support the statement on page 16 (lines 2-4) of USPS witness Van-Ty-Smith’s testimony that “the not-handling tallies for non-allied cost pools are proposed by the USPS to be distributed to subclasses using the direct and distributed mixed tallies within the same cost pool.” If you do not confirm this statement, please identify, in detail, all documents which support witness Van-Ty-Smith’s statement on page 16 (lines 2-4) of her testimony and provide all such documents with your response.