

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
WITNESS KINGSLEY TO INTERROGATORY OF
THE ASSOCIATION OF AMERICAN PUBLISHERS
(AAP/USPS-T10-16)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of the Association of American Publishers: AAP/USPS-T10-16, filed on April 4, 2000.

The 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



Susan M. Duchek

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April 13, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION OF AMERICAN PUBLISHERS**

AAP/USPS-T10-16 Please refer to your response to AAP/USPS-T10-14. In your response you state that Attachment H to the testimony of Postal Service witness Crum and that data supporting that attachment are "not the only evidence that proves this inefficiency of the outdated local entry." You also refer to information being provided on "numerous occasions" from customers that shows that they are depositing mail at facilities addressed to locations outside of that facility's service area. Please provide all documents which represent the "evidence" referred to by your response and which support the alleged inefficiency for BPM. For purposes of your response, you do not need to provide Attachment H of witness Crum's testimony or the Bound Printed Matter Study (USPS-LR-109) referred to in witness Crum's testimony.

Response:

As stated in AAP/USPS-T10-14, this information is often provided from customers directly to delivery units, so documents can not be provided in these cases. We have become aware of many of these situations from verbal complaints originating from delivery units that focus on the negative consequences related to local entry. Finally, during conversations with specific large mailers concerning their upcoming appointment activity, it has been clear that their entry profiles result in the previously stated inefficiencies. Moreover, these are not merely "alleged" inefficiencies, but rather are the virtually inevitable result of rational mailer behavior under the current, outdated requirements.

DECLARATION

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

Linda A. Kingsley
Date: 4-13-2000

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.



Susan M. Duchek

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