

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

FIRST SET OF INTERROGATORIES OF
MAIL ORDER ASSOCIATION OF AMERICA TO
ASSOCIATION OF AMERICAN PUBLISHERS WITNESS SIWEK (MOAA/AAP-T-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of America (MOAA), submits the following interrogatories to AAP witness Siwek (AAP-T-2).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

David C. Todd /ATR
David C. Todd

Date: June 6, 2000

INTERROGATORIES OF MAIL ORDER ASSOCIATION OF AMERICA
TO ASSOCIATION OF AMERICAN PUBLISHERS WITNESS SIWEK

MOAA/AAP-T-2-1 You criticize the “pass-through” proposals of USPS witness Kiefer for destination discounts as “disparate and discriminatory” (at 25). Please explain why your pass-through proposals ranging from 19.7 to 33.9 percent of calculated cost savings are not “disparate and discriminatory.”

MOAA/AAP-T-2-2 Please confirm the following as an accurate presentation of your pass-through proposals.¹

	Savings	Per Piece Discount	Amount of Savings Not Passed Through
DBMC	\$0.38	\$0.129	\$0.251
DSCF	\$0.529	\$0.129	\$0.4
DDU	\$0.656	\$0.129	\$0.527

MOAA/AAP-T-2-3 Please explain your reasons for combining two different pools of cost savings (carrier route and destination entry) in making your comparison of cost savings for DDU, DSCF and DBMC entry.

MOAA/AAP-T-2-4 How long has a carrier route discount been in effect for BPM?

MOAA/AAP-T-2-5 Please confirm that for Standard Mail A ECR destination discounts are provided as a separate portion of the rate schedule.

¹ AAP-T2, Attachment 4, Table 1, page 1.