

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

RECEIVED

JUN 6 2 44 PM '00

POSTAL RATE AND FEE CHANGES, 2000

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

FIRST SET OF INTERROGATORIES OF
MAIL ORDER ASSOCIATION OF AMERICA TO
ASSOCIATION OF ALTERNATE POSTAL SYSTEMS WITNESS WHITE (MOAA/AAPS-T-1)

Pursuant to Sections 25 and 26 of the rules of practice, the Mail Order Association of America (MOAA), submits the following interrogatories to AAPS witness White (AAPS-T-1).

Respectfully submitted,

David C. Todd/HJR
David C. Todd
PATTON BOGGS LLP
2550 M Street, NW
Washington, DC 20037-1350
Telephone: (202) 457-6410
Counsel for Mail Order Association of America

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/HJR
David C. Todd

Date: June 6, 2000

INTERROGATORIES OF MAIL ORDER ASSOCIATION OF AMERICA
TO ASSOCIATION OF ALTERNATE POSTAL SYSTEMS WITNESS WHITE

MOAA/AAPS-T-1-1 You claim that the Postal Service proposal will “do even greater harm” to “our industry” for the “heavier weight material for which we compete” (at 2, 3).

a. Please provide the annual volumes for 1995 - 1999 of materials carried by Distribution Systems of Oklahoma (DSO) that “would qualify as Standard Mail Saturation advertising pieces” (at 2).

b. Please provide the annual volumes for 1995 – 1999 of materials carried by DSO that are phone books and the percentage of those phone books that weigh more than sixteen ounces.

c. Please provide the annual volumes of materials carried by DSO for the years 1995 – 1999 that would qualify as Standard Mail A ECR pieces only at the basic B (rather than the Saturation or High Density levels).

d. Please provide a copy of the rate schedule (or schedules) that reflect the current rates charged by DSO, including the effect of the weight of a piece upon rates.

MOAA/AAPS-T-1-2 In preparing your testimony, were you provided with rate information by members of the Association of Alternate Postal Systems?

a. If so, please provide copies of all such rate information.

b. If not, is it your contention that the rates charged by members of the Association are irrelevant to the Commission’s evaluation of your testimony?

MOAA/AAPS-T-1-3 In preparing your testimony did you request data from members of your Association about the effect of weight upon the rates charged by those members?

a. If so, please provide copies of all such rate information.

b. If not, is it your contention that the effect of weight upon rates of the members is irrelevant in the Commission's evaluation of your testimony?

MOAA/AAPS-T-1-4 Is it your position that the revenue loss that you claim resulted from "reducing the postage rates for the most densely delivered magazines" (at 3) is relevant to the Commission's consideration of Standard Mail A rates?

MOAA/AAPS-T-1-5 Is it your position that the existing or USPS proposed rates for magazines and periodicals are too low?

MOAA/AAPS-T-1-6 Is it your position that the rates for Standard Mail A should be established without regard to costs?

MOAA/AAPS-T-1-7 Please explain fully your statement that "our industry is forced to use Postal Service prices as a guide to setting ours . . ." (at 5).

MOAA/AAPS-T-1-8 What percentage of (a) DSO's, and (b) your Association member's volumes consist of "shared mail set[s]" (at 7)?

MOAA/AAPS-T-1-9 What percentage of (a) DSO's, and (b) your Association member's volumes consist of "heavier weight items" that are not part of a "shared mail set"?