

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

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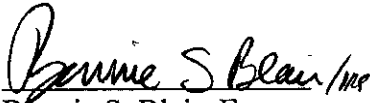
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

FIRST SET OF INTERROGATORIES BY  
THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS  
TO SATURATION MAIL COALITION  
WITNESS ROGER MERRIMAN  
(AAPS/SMC-T2-1-10)

Pursuant to the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatories to Saturation Mail Coalition Witness Merriman.

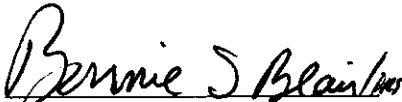
Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.

  
Bonnie S. Blair, Esq.

Dated: June 16, 2000

**FIRST SET OF INTERROGATORIES BY  
THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS  
TO SATURATION MAIL COALITION  
WITNESS ROGER MERRIMAN  
(AAPS/SMC-T2-1-6)**

AAPS/SMC-T2-1. At page 2, lines 24-26, you state that “more sensible pricing” would help the Postal Service increase its pound rate revenues.

- (a) By “more sensible,” do you mean that the pound rate should be lower?
- (b) If the pound rate were reduced, would the pound rate revenues from your publication be increased? Explain.

AAPS/SMC-T2-2. At page 4, lines 8-10, and at page 5, lines 20-24, you praise the “stable” postal rates paid by your publication over the past five years and state that the stable rates have resulted in your greatest circulation growth and additional revenues to the Postal Service. Would these benefits be diminished if rates were to remain stable over the next three years? Explain any negative answer.

AAPS/SMC-T2-3. Why, as you testify at page 8, line 6, is switching to a private carrier not an option for rural publishers? Would the cost be higher if they switched?

AAPS/SMC-T2-4. (a) If the ECR rates proposed by the Postal Service were implemented, by how much would you reduce the rate charged to your insert mailers? (b) If the ECR rates proposed by the Postal Service were implemented, by how much would you reduce the rate charged to your classified advertisers?

AAPS/SMC-T2-5. You refer at page 7, line 23, to the “weight-related prices” you charge to your major insert advertisers. Please provide a rate schedule showing those prices or, if such a schedule is not available, describe the rates applicable to inserts.

AAPS/SMC-T2-6. If as you state at page 8, lines 6-12, the prices that must be charged by free papers that use the mail must be so much higher than the rates charged by free papers that are delivered outside the mail, why are there free papers in urban areas (such as the *Miami Flyer* described by AISOP witness Baro) in the mail?

AAPS/SMC-T2-7. You state at the bottom of page 8 and the top of page 9 that carriers working for “private carriers” are often paid one cent or less to insert and deliver an advertisement, and that this payment “commonly” applies even up to 32 pages. Please provide all of your support for these claims, including specifically an identification of the “private carriers” that pay one cent or less to their carriers for inserting and delivering 32-page inserts.

AAPS/SMC-T2-8. You state at page 10, lines 2-4, that the present pound rate causes publishers to “think twice” before adding content that takes the piece above the break point. (a) If the added content is advertising, doesn’t that advertising produce additional revenues? (b) In 1999, what

percentage of the content of the *Farmer and Rancher Exchange* was advertising? (c) Would publishers think only once if the pound rate proposed by the Postal Service were adopted? (d) At what pound rate would this supposed problem disappear?

AAPS/SMC-T2-9. At page 10, lines 16-24, you testify about giving space to charities and community events. (a) In 1999, what percentage of the run-of-press space in your publication was donated for this purpose? (b) In 1999, what percentage of the inserts were used for this purpose? (c) Is it your testimony that publishers will give space to charities only if there is no additional postage cost associated with that space? (d) Please quantify the amount by which you have "cut back" on free space and specify the time period during which that cut back took place. (e) Please confirm (or explain why if you cannot) that donating run-of-press space to a charity generally does not affect the weight of the piece (because it does not cause an increase in the page count or weight of the page) and therefore, while it might prevent sale of that space to a paying advertiser, it does not affect the postage.

AAPS/SMC-T2-10. At the bottom of page 10 and the top of page 11, you discuss giving away reader ads. (a) Please confirm that these ads would typically be run-of-press ads, not inserts. (b) In 1999, what percentage of your publication's run-of-press content was devoted to free reader ads? (c) In 1999, what percentage of your publication's run-of-press content was "filler."