

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

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POSTAL RATE COMMISSION
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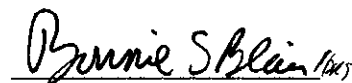
POSTAL RATE AND FEE CHANGES, 2000)
_____)

Docket No. R2000-1

FIRST SET OF INTERROGATORIES BY
THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
TO ALLIANCE OF INDEPENDENT STORE
OWNERS AND PROFESSIONALS
WITNESS ORLANDO BARO
(AAPS/AISOP-T2-1-9)

Pursuant to the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatories to Alliance of Independent Store Owners and Professionals Witness Baro.

Respectfully submitted,

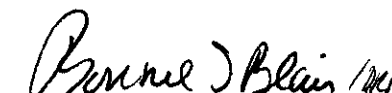


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CERTIFICATE OF SERVICE

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

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WITNESS ORLANDO BARO
(AAPS/AISOP-T2-1-9)**

AAPS/AISOP-T2-1. For calendar year 2000 through May 3, what percentage of *The Flyer* copies were mailed at the piece rate?

AAPS/AISOP-T2-2. (a) Please confirm that the May 31, 2000 edition of *The Flyer* that is marked "The Trail" and "908" weighs approximately 3.7 ounces, including inserts. (b) Please confirm that the base publication consists of 44 pages, nearly all of which is advertising, and that it measures approximately 7 inches by 10 inches. (c) Please confirm (or explain why you cannot confirm) that this edition contains the following inserts: (1) a four-page glossy for Navarro Pharmacies measuring approximately 8½ by 11 inches, (2) a one-sheet glossy with a pizza ad on one side and two separate home improvement ads on the other side, measuring approximately 8½ by 11 inches, (3) a one-sheet glossy with a Camis restaurant ad on one side and a Pearle Vision ad on the other, measuring approximately 8½ by 11 inches, (4) a four-page Amigo Supermarket ad, folded to measure approximately 9 inches by 11 inches, (5) a four-page Popular Discount glossy ad, measuring approximately 9 by 10½ inches, (6) a one-sheet glossy for Navarro Pharmacies promoting hair care products on each side, measuring approximately 8½ by 11½ inches, (7) a four-page Sedano's Supermarkets ad, folded to measure approximately 9 inches by 11 inches, (8) a four-page menu from Yi Wong, measuring approximately 7½ inches by 11 inches and (9) an ad for Best Look carpet and upholstery cleaners, measuring approximately 3¾ by 11 inches. (d) At what rate (e.g., ECR saturation) was this publication mailed, and what was the per-copy postage?

AAPS/AISOP-T2-3. You testify at page 2 that it is important to "maintain reasonable rates" for ECR mail. When was the last time that the rates for saturation ECR pieces like *The Flyer* were increased, and what was the percentage increase?

AAPS/AISOP-T2-4. When you testify at page 3 that 75% of your business comes from customers with only one or two stores, does that percentage refer to the number of customers or to the amount of revenue?

AAPS/AISOP-T2-5. You testify that ads for K-Mart, Wal-Mart and national grocers cannot be found in your paper. Can they be found in ADVO shared mail sets or other mailed products?

AAPS/AISOP-T2-6. You testify at page 4 that you are your customers' partner. If the Postal Service's proposed rates are approved, by how much will you reduce the advertising charges your customers pay?

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(AAPS/AISOP-T2-1-9)**

AAPS/AISOP-T2-7. You testify at page 5 that you are dependent upon the Postal Service's "keeping its basic saturation rate affordable." (a) Would that rate cease to be affordable if it were to increase no more rapidly than the CPI? (b) Is it your testimony that saturation rates never should be increased?

AAPS/AISOP-T2-8. You testify at page 5 that significant price increases hurt small businesses. By how much would you be required to raise your prices to small businesses if the current saturation postage rates remain unchanged for the next three years?

AAPS/AISOP-T2-9. If, as you state at page 5, your customers are offered attractive deals by nonpostal competitors, why doesn't *The Flyer* shift to nonpostal delivery?