

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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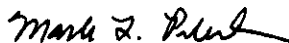
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POSTAL RATE AND FEE CHANGES, 2000  
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: Docket No. R2000-1  
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**INTERROGATORIES OF  
ASSOCIATION OF AMERICAN PUBLISHERS  
TO USPS WITNESS THRESS AAP/USPS-ST46-1-5**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publisher (AAP), hereby submits the following interrogatories and request for production of documents to USPS witness Thress (USPS-ST-46). If the designated witness is unable to respond to any interrogatory, or any part therein, we request a response by some other qualified witness.

Respectively submitted,




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Counsel for Association  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding.

  
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John R. Przepyszny

Dated: July 26, 2000

**INTERROGATORIES OF  
ASSOCIATION OF AMERICAN PUBLISHERS  
TO USPS WITNESS THRESS**

**AAP/USPS-ST46-1** At Table 1 of your testimony, you provide a comparison of actual Total Standard B mail volume for the first three quarters of 2000 with the USPS' forecasted Total Standard B mail volumes for the same three quarters. With respect to this Table, please provide the underlying forecasted and actual volumes for the same period separately for Parcels Zone Rate, Bound Printed Matter, Special Standard and Library Mail.

**AAP/USPS-ST46-2** At Table 2 of your testimony, you provide a comparison of forecast accuracy for the USPS R2000-1 forecast versus the forecast accuracy of the R97-1 and R94-1 forecasts. With respect to this Table, please provide the underlying data separately for Parcels Zone Rate, Bound Printed Matter, Special Standard and Library Mail for the R97-1 and R94-1 forecast error calculations.

**AAP/USPS-ST46-3** Please provide the historical underlying data for real personal consumption expenditures per adult from DRI that were used in the USPS test year volume forecast as described on page 6 (lines 9-12) of your testimony.

**AAP/USPS-ST46-4** Please provide the historical data currently provided by DRI for real personal consumption expenditures per adult that are described on page 6 (lines 12 – 15) of your testimony.

**AAP/USPS-ST46-5** Please provide all new elasticities for Bound Printed Matter that you, or the Postal Service, have calculated using “new Commerce Department data” as described on page 6 (lines 16-20) of your testimony.