

**OFFICE OF THE SECRETARY  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE AND FEE CHANGES, 2000  
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Docket No. R2000-1

**AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
JOINT INTERROGATORY TO USPS WITNESS PATELUNAS  
(ABA&NAPM/USPS-ST44-28)**

(July 31, 2000)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit this joint interrogatory. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

- a. Please confirm that as of July 28, 2000, you have not provided all of the piggyback data inputs in your revised case which would enable intervenors or the Commission to update your or their cost avoidance studies. If you cannot confirm, explain why not.
- b. Do you intend to submit these remaining piggyback inputs to the Commission?
- c. If your answer to b. is other than an unequivocal "No," will you submit these data inputs to the Commission prior to August 14<sup>th</sup>, the due date for filing by intervenors of testimony incorporating or rebutting the USPS July 7 and 21, 2000 revisions.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION  
NATIONAL ASSOCIATION OF PRESORT MAILERS

By: \_\_\_\_\_  


Henry A. Hart, Esq.  
Reed Smith Shaw & McClay LLP  
1301 K Street N.W.  
Suite 1100 - East Tower  
Washington, DC 20005  
Ph: 202-414-9225  
Fax: 202-414-9299

Counsel for  
National Association  
of Presort Mailers

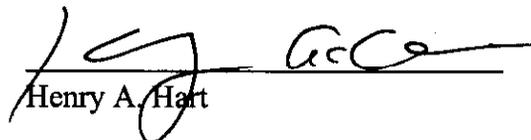
Date: July 31, 2000  
Washington, D.C.

Irving D. Warden  
Assoc. General Counsel  
American Bankers Association  
1120 Connecticut Ave., NW  
Washington, DC 20036  
Ph: 202-663-5035  
Fax: 202-828-4548

Counsel for  
American Banker Association

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
Henry A. Hart

July 31, 2000