

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

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POSTAL RATE AND FEE CHANGES, 2001)
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POSTAL RATE COMMISSION
Docket No. R2001-1
FEDERAL SECRETARY

**FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS BY THE ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS TO THE UNITED STATES POSTAL
SERVICE WITNESS LARAIN B. HOPE
(AAPS/USPS-T31-1-2)**

Pursuant to the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatories and requests for production of documents to the United States Postal Service witness Hope. If any request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,


Bonnie S. Blair, Esq.
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Counsel for the Association
of Alternate Postal Systems

CERTIFICATE OF SERVICE

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


Bonnie S. Blair, Esq.

Dated: October 17, 2001

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS (AAPS)
TO THE UNITED STATES POSTAL SYSTEM
WITNESS LARAIN B. HOPE (USPS-T-31)
(AAPS/USPS-T31-1-2)

AAPS/USPS-T31-1. Please provide a table equivalent to that presented on page 15 of your testimony for ECR Saturation mail volumes.

AAPS/USPS-T31-2. At pages 17-19 of your testimony, you show the weight points at which the Postal Service is proposing rate reductions for basic, high density and saturation Standard mail. If the Postal Service were to freeze all of those rates for which a rate reduction is requested, by how much would its test year revenues increase?