

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  
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 GEORGE S. TOLLEY  
(AAPS/USPS-T7-1-2)**

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 Tolley. If any request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

*Bonnie S. Blair*

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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*

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 GEORGE S. TOLLEY (USPS-T-7)  
(AAPS/USPS-T7-1-2)

AAPS/USPS-T7-1. You explain at page 111 that the real own price of ECR mail dropped 5.2% over the past five years, leading to an increase of 3.95% in volume. Do you agree that, assuming competitors for the delivery of such mail experienced cost increases during that period, it is likely that a portion of the increased ECR volume represents pieces that were shifted from those competitors to the Postal Service?

AAPS/USPS-T7-2. Are you familiar with, or are you at all aware of, any studies that address the effect on competitors' volumes of increases or decreases in the postage rate of ECR mail?