

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

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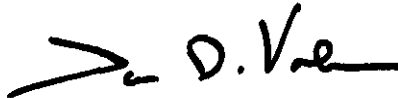
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS MOELLER
(POSTCOM/USPS-T-32-1-5)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for
Postal Commerce submits the attached interrogatories to USPS witness Moeller:
PostCom /USPS-T-32-1-5.

Respectfully submitted,



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Counsel for Association for Postal Commerce

October 18, 2001

POSTCOM/USPS-T32-1. Please list all changes in mail preparation requirements for Standard Mail and eligibility requirements for Standard Mail discounts that have been implemented since the beginning of FY 2000 or are expected to be implemented before the end of FY 2003. Please also provide a summary of each change, its actual or planned implementation date, and an explanation of the reason for the change. If there is no planned implementation date for a particular change, please provide your best estimate for the implementation date.

POSTCOM/USPS-T32-2. Is page 59 of USPS LR-J-60 the source of the "added cost[s] due to non-machineability" that you recite at page 15 lines 19-21 of your testimony?

POSTCOM/USPS T32-3. Should the parenthetical at the end of the sentence beginning at line 21 of page 15 and ending at line 2 of page 16 read "(4.9 cents for 5-digit nonautomation)."

POSTCOM/USPS T32-4. Why have you chosen to set the surcharge slightly below the "lowest cost differential" that you found in LR-J-60?

POSTCOM/USPS T32-5. Please define the term "nonmachinable" as it is used in section IV(C)(5)(c) of your testimony and explain every difference between that definition and the provisions of DMM § M810.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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