

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

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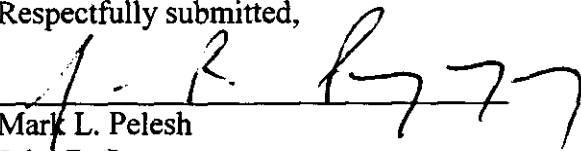
POSTAL RATE AND FEE CHANGES, 2001 )

Docket No. R2001-1

**FIRST SET OF INTERROGATORIES OF  
ASSOCIATION OF AMERICAN PUBLISHERS  
TO USPS WITNESS TOLLEY (AAP/USPS-T7-1-10)**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publishers (AAP), hereby submits the following interrogatories and request for production of documents to USPS witness Tolley (USPS-T-7). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

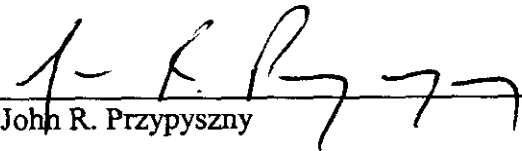
Respectfully submitted,

  
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Counsel for Association of  
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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.

  
\_\_\_\_\_  
John R. Przypyszny

Date: October 24, 2001

**INTERROGATORIES OF ASSOCIATION OF AMERICAN PUBLISHERS  
TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY**

**AAP/USPS-T7-1** On page 146 of your testimony (USPS-T-7) you state that "Bound printed matter is advertising, promotional, directory or editorial material which weighs between 1 and 10 pounds and is permanently bound." With respect to this statement:

- (a) Please confirm that Bound Printed Matter ("BPM") also consists of books.
- (b) Please explain why your testimony fails to mention that BPM also consists of books.
- (c) Please confirm that your testimony is in error and that there no longer is a minimum weight requirement for BPM and that BPM mail may weigh up to 15 pounds.

**AAP/USPS-T7-2** On page 148 of your testimony you state that "[a] downward shift in volume beginning in 1998Q1 contributed to a 12.15 percent decrease in the volume of Bound Printed Matter." With respect to this statement:

- (a) Please provide an explanation for the 12.15 percent decrease in volume since 1998Q1.
- (b) Is the decrease in volume due a to a decrease in the number of catalogs sent as BPM? If your answer is no, please identify all factors that contributed to the decrease in volume.
- (c) Has the Postal Service compiled any information or data to show what the effect the rate increases in the R2000-1 rate case have had on BPM volume. If yes, please provide all such information or data. If no, please explain why the Postal Service has not compiled such information or data.

**AAP/USPS-T7-3** On page 149 of your testimony, you state that "[t]he growth in catalog sales is indicative of growth in the volume of catalog deliveries and is favorable to Bound Printed Matter." With respect to this statement:

- (a) Please identify all information, data, reports or studies that you relied upon to support this statement. Please provide all such information, data, reports or studies.
- (b) Has the Postal Service gathered or collected any information or data that shows that the number of catalogs sent as BPM has increased during the five years ending in 2001Q3? If yes, please provide that information or data.

**AAP/USPS-T7-4** Please identify and provide all documents, studies reports, data or other evidence upon which you relied to conclude that the "Other Factors" described on page 148 of your testimony in any way support or relate to the trends in catalog mail that you describe on page 149 of your testimony.

**AAP/USPS-T7-5** Please provide the *Traffic World* and *Traffic Management* articles referred to on page 148 and 149 of your testimony.

**AAP/USPS-T7-6** Please state the volume of the BPM subclass that consists of catalogs for each of the years 1995–2000. Include source references to support your response.

**AAP/USPS-T7-7** Please state the volume of the BPM subclass that consists of books for each of the years 1995-2000. Include source references to support your response.

**AAP/USPS-T7-8** Please state the volume of the BPM subclass that consists of phone books for each of the years 1995-2000. Include source references to support your response.

**AAP/USPS-T7-9** Please state the volume of the BPM subclass that does not consist of either catalogs, books or phone books. Include source references to support your response.

**AAP/USPS-T7-10** Line 21 of Page 149 of the PDF version of your testimony found on the PRC website, as well as the hard-copy of Page 149 obtained by AAP, is not legible. Please provide a legible copy of Page 149 of your testimony.