

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

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POSTAL RATE AND FEE CHANGES, 1997)
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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE 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 TAKIS
(AAPS/USPS-T41-1-3)**

Pursuant to Sections 25 and 26 of 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 Takis. If any request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

Bonnie S. Blair
Bonnie S. Blair, Esq.
THOMPSON COBURN
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Washington, D.C. 20005

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: September 5, 1997

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF ALTERNATE POSTAL SYSTEMS (AAPS)
TO THE UNITED STATES POSTAL SYSTEM WITNESS TAKIS (USPS-T-41)
(AAPS/USPS-T41-1-3)

AAPS/USPS-T41-1

In response to UPS/USPS-T41-4(d), you state that only advertising expenses related to "particular products" are specific fixed costs assigned to classes of mail and that of \$235 million of advertising expenses, only \$66 million is so assigned. How much of this \$66 million is assigned to Standard Mail?

AAPS/USPS-T41-2

Are advertising expenses promoting "direct mail" or "advertising mail" considered related to "particular products"? Please explain.

AAPS/USPS-T41-3

Within the past two years, the Postal Service produced and circulated a direct mail advertising ensemble consisting of a cardboard outside wrapper designed to look like a leather briefcase containing, among other things, a 96-page booklet entitled "A Small Business Guide to Advertising with Direct Mail," a pamphlet entitled "A Short Course In Direct Mail for Small Business," a pamphlet entitled "Advertising with Mail, a Smart Solution," a large folder (with enclosures) entitled "Mail Brings It All Home," and a videotape entitled "Growing Your Business with Advertising Mail." With respect to this promotion, please state: (a) would an expenditure of this type be deemed related to "particular products" and therefore assigned to a class of mail or would it be considered an institutional cost? (b) how many copies of the material described above were produced and distributed? (c) to whom where they distributed? (d) how much did this advertising campaign cost the Postal Service and over what period of time? (e) is this material still being distributed? If so, please explain current and future plans for this campaign.