

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

POSTAL RATE AND FEE CHANGES, 1997)
_____)

Docket No. R97-1

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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 MOELLER
(AAPS/USPS-T36-1-6)**

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 Moeller. 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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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 MOELLER (USPS-T-36)
(AAPS/USPS-T36-1-6)

AAPS/USPS-T36-1

In response to VP-CS/USPS-T36-10, you state that there is no performance measurement system in place for third-class mail. Because quality of service is such an important input into the assignment of institutional costs, please explain why the Postal Service has no such system in place.

AAPS/USPS-T36-2

You testify that you are proposing a residual-shape surcharge for Standard Mail of 10¢ per piece even though Postal Service Witness Crum demonstrates a cost difference in excess of 35¢. (a) One of the reasons for your proposal to hold the surcharge to 10¢ is to mitigate the impact of the potential increase in rates on customers. Please provide any studies performed by or for the Postal Service that support the notion that a surcharge in excess of 10¢ per page would have a significantly adverse impact on customers. (b) Does the 35¢ cost difference reflect in-office costs alone, or does it reflect carrier costs while delivering mail?

AAPS/USPS-T36-3

What are the implicit cost coverages for Standard A, residual pieces?

AAPS/USPS-T36-4

Is it the Postal Service's intention to increase the surcharge so that it comes close to reflecting the actual cost difference? Does the Postal Service have a schedule for doing so?

AAPS/USPS-T36-5

At page 27, you state that the Postal Service proposes to pass through thirty-five percent of the shape differential between ECR letter and non-letters. How much would the ECR non-letter rates increase if 100% of this differential were passed through.

AAPS/USPS-T36-6

Does the Postal Service consider that it faces the greater competition for ECR letters or ECR flats?