

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

RECEIVED

POSTAL RATE AND FEE CHANGES, 1997)
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SEP 5 2 52 PM '97
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 NEEDHAM
(AAPS/USPS-T39-1)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatory to the United States Postal Service witness Needham. If this request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

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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 NEEDHAM (USPS-T-39)
(AAPS/USPS-T39-1)

AAPS/USPS-T39-1

At page 24, you state the Postal Service does not charge for sequencing cards in carrier route walk sequence. (a) Would it therefore follow that the cost of sequencing cards is an institutional cost? (b) If so, is it correct that most of the cost of sequencing cards into walk sequence is paid for by mailers that do not walk sequence their mail and therefore do not obtain the discounts related to walk sequencing? Please explain.