

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
(AAPS/USPS-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. We request that a response be provided by a USPS witness or some other qualified representative.

Respectfully submitted,

Bonnie S. Blair
Bonnie S. Blair, Esq.
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700 14th Street, N.W., Suite 900
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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 (USPS)
(AAPS/USPS-1-6)

AAPS/USPS-1

Please confirm there has recently been an arbitrator's ruling that the Postal Service may not require carriers to carry four separate "bundles" on the street. If you can confirm this ruling, provide a copy of the arbitrator's decision.

AAPS/USPS-2

Why did the Postal Service desire that its carriers carry four separate bundles?

AAPS/USPS-3

If a carrier that formerly carried four bundles may now carry only three bundles, explain how that carrier's activities in sorting and delivering the mail will be changed.

AAPS/USPS-4

Please confirm that in accounting period 11, the quantity of Standard Mail (A) increased by 13.6 percent over the same period last year. If you can confirm an increase of this approximate size, please explain why, in the Postal Service's opinion, the amount of this mail has increased so rapidly.

AAPS/USPS-5

Since the reclassification decision especially, postal officials, including the Postmaster General, have been quoted in the press as having commented favorably on driving competitors out of business. We note specifically the PMG's reported comments about Publishers Express. Please provide copies of his statement and of any other public statements by postal officials -- oral or written --- in the past three years addressing damage to postal competitors.

AAPS/USPS-6

Has the Postal Service conducted or commissioned a study or report on alternate delivery since the SAI report revealed during the course of Docket No. MC95-1? If so, please provide a copy of any completed study or report or a description of any work in process.