

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

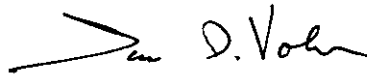
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KIEFER
(POSTCOM/USPS-T-33-13-14)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for
Postal Commerce submits the attached interrogatories to USPS witness Kiefer:
PostCom/USPS-T-33-13-14.

Respectfully submitted,



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Counsel for Association for Postal Commerce

November 9, 2001

POSTCOM/USPS-T33-13. The following questions refer to your Supplemental Workpaper 2:

- (a) Does LR-J-112 differentiate between flats and parcels/IPPs?
 - 1. If so, on what is that differentiation based?
 - 2. If not, how did you make the differentiation in your Work paper?

- (b) How did you determine the number of "Eligible Presorted Flats" (including a definition of what you considered to be "Eligible Presorted Flats")?

POSTCOM/USPS-T33-14. Please display the calculations employed to obtain the After Rates numbers in Attachment D to your testimony by each rate that you employ to determine total revenue, separately stating for each rate the volume and costs assumptions.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

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November 9, 2001