

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-33-16-18)

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-33-16-18.

Respectfully submitted,

*Ian D. Volner*

Ian D. Volner  
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Counsel for Association for Postal Commerce

November 21, 2001

**POSTCOM/USPS-T33-16.** Please refer to your response to POSTCOM/USPS-T33-8. Please provide an update to BPM-WP-3 using data from any FY 2001 post-R2000-1 rate implementation period for which the Postal Service has data.

**POSTCOM/USPS-T33-17.** Please refer to your response to POSTCOM/USPS-T33-9. Do you believe that the dropship discounts that you discuss these achieved the goals that they were designed to achieve? If not, please explain your belief as to why not.

**POSTCOM/USPS-T33-18.** Please refer to your response to POSTCOM/USPS-T33-11(d) where you state, "To my knowledge, no data have been collected that identify the number or proportion of flats bearing Postnet barcodes (that is, "flats" barcodes) in FY 2000." Please also refer to USPS-LR-J-106, BPMWP.xls.

(a) Please confirm that the Test Year After Rates (TYAR) revenue leakage from the flats barcode discount for Presort BPM is approximately \$4.6 million.

(b) Please confirm that the revenue leakage from the flats barcode discount results from approximately 154 million TYAR BPM flats having Postnet barcodes on them. If not confirmed, please provide the correct figure.

(c) Please confirm that Carrier Route BPM flats are not eligible for the flats barcode discount. If not confirmed, please explain your response fully.

(d) Please confirm that BPMWP.xls, WP-BPM-26 shows that the total volume of non-Carrier Route Presort BPM flats is approximately 163 million pieces. If not confirmed, please explain your response fully.

(e) Please confirm that BPMWP.xls indicates that, in TYAR, approximately 95 percent of non-Carrier Route Presort BPM flats have Postnet barcodes on them. If not confirmed, please explain your response fully.

(f) Please confirm that the Postal Service has no actual data on the number or proportion of BPM flats bearing Postnet barcodes for any year. If not confirmed, please explain your response fully.

(g) Please confirm that in the Base Year mailers did not receive a discount for putting a Postnet barcode on BPM flats. If not confirmed, please explain your response fully.

**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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