

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

Docket No. R97-1

**INTERROGATORIES OF
AMERICAN LIBRARY ASSOCIATION
TO UNITED STATES POSTAL SERVICE
(ALA/USPS-1-6)
September 12, 1997**

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the American Library Association ("ALA") respectfully submits the attached interrogatories and requests for production of documents. Instructions for these questions appear in Appendix A.

ALA/USPS-1. Please confirm each of the following statements. Please explain fully any failure to give an unqualified confirmation.

- (a) The Postal Service is proposing increased rates averaging 4.5 percent across all types of domestic mail.
- (b) For the library rate, the proposed increase is 28.6 percent for the first pound, 27.3 percent for a 2-lb. package, and 24.6 percent for an 8-lb. package.
- (c) In Docket No. R94-1, the Postal Service proposed a 73.7 percent average increase for the library rate.

- (d) In Docket No. R94-1, the average rate increase for library rate implemented by the Postal Service was 69.9 percent.
- (e) If the Postal Service's current rate request is implemented, the library rate for a three-pound piece would be \$2.48, a 117.5 percent increase in 3 years.

ALA/USPS-2. Please explain why the costs attributed by the Postal Service to library rate mail have increased so much in the last few years.

- (a) If you contend that the Postal Service's costing systems previously understated the actual attributable costs of library mail, please identify the cause of the under attribution, quantify its significance, and produce all studies, reports, analyses, compilations and other documents that support your response.
- (b) If you contend that the all or part of the reported cost increase is due to changes in the characteristics of library rate mail, please identify the changed characteristics, quantify their cost-causing significance, and produce all studies, reports, analyses, compilations and other documents that support your response.
- (c) If you contend that all or part of the reported cost increase is due to any other factor, please identify the factor, quantify its cost-causing significance, and produce all studies, reports, analyses, compilations and other documents that support your response.

ALA/USPS-3. After the conclusion of Docket No. R94-1, Postal Service data showed that the actual costs of library rate mail were less than the projected costs on which the 1995 increase was based. Chairman Gleiman wrote to the Board of Governors inquiring whether a rate decrease would be warranted. The Postal Service declined to roll back the library rate, and now proposes another large increase.

- (a) Please identify all reasons for the Postal Service's decision not to roll back any portion of the library rate increase authorized in Docket No. R94-1; identify all studies, reports, analyses, compilations of data, and other documents that you contend support those reasons; and produce all identified documents that are not publicly available.
- (b) Please produce all correspondence, memoranda and other written communications generated to, from, or within the Postal Service in connection with its decision to roll back none of the R94-1 rate increase in the library rate.
- (c) Please identify any audits, studies, changes in costing and data collection systems, and other efforts taken by or on behalf of the Postal Service since Docket No. R94-1 to improve the accuracy of the Service's attributable cost data for library rate mail. Produce all documentation of such efforts.

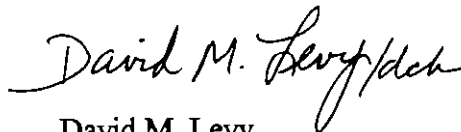
ALA/USPS-4. Please confirm that the following table shows the existing and proposed rates for special standard (book rate) and library rate mail. Explain fully any failure to confirm unconditionally:

<i>Special standard mail (book rate)</i>	<i>current (cents)</i>	<i>proposed (cents)</i>
First pound, not presorted	124	124
Each additional lb. through 7 lbs.	50	51
Each additional lb. over 7 lbs.	31	21
<i>Library rate</i>	<i>current (cents)</i>	<i>proposed (cents)</i>
First pound	112	144
Each additional lb. through 7 lbs.	42	52
Each additional lb. over 7 lbs.	22	25

ALA/USPS-5. Please explain how the library rate, a preferred rate, can exceed the book rate for a piece of the same weight. Identify all studies, analyses, reports, compilations of data, and other documents that support your response, and produce all identified documents that are not publicly available.

ALA/USPS-6. Please explain why the costs attributed by the Postal Service to library rate mail have grown more rapidly since Docket No. R94-1 than the costs attributed to book rate mail. Identify all studies, analyses, reports, compilations of data, and other documents that support your response, and produce all identified documents that are not publicly available.

Respectfully submitted,

A handwritten signature in cursive script that reads "David M. Levy".

David M. Levy
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Counsel for American Library Association


September 12, 1997

INSTRUCTIONS

1. Please redirect each question to a witness who can answer it under oath.
2. If the requested data cannot be produced with reasonable effort in the exact format or level of detail requested, please produce all data available in (1) a substantially similar format or level of detail, or (2) susceptible to being converted to the requested format and detail.
3. The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimony, pamphlets, charts, tabulations, and workpapers. Documents also include information on computer media, microfilm and other non-paper media.
4. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. Workpapers shall include sufficient backup material to enable a third party to replicate the final results from the primary sources. Where arithmetic manipulations were performed by a computer with internally stored instructions, and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, reading "David M. Levey", is written over a horizontal line.

September 12, 1997