

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE ASSOCIATION OF ALTERNATE POSTAL SYSTEMS WITNESS BRADSTREET
(USPS/AAPS-T-1-11-18)

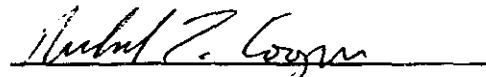
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Association of Alternate Postal Systems witness Bradstreet: USPS/AAPS-T-1-11-18.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
January 14, 1998

USPS/AAPS-T1-11. Please see your testimony at page 43, lines 3-6. Is it your testimony that heavier First Class pieces have fewer alternatives than lighter First Class pieces? Please explain fully, providing the complete basis for your opinion.

USPS/AAPS-T1-12. Please see your testimony at page 11, lines 16-20. ■

- a. Is it your testimony that the pound rate be set so as to remove the use of the Postal Service from consideration on the part of a publisher? Please fully explain your response.
- b. What do you mean by the "cost of weight" in line 19? Please explain fully.

USPS/AAPS-T1-13. Please see your testimony at page 45, line 17-20, where you state, in part, that "alternate delivery companies are already getting quite a bit of sample business in the more major markets under the current rate structure." Confirm that, all other things being equal, imposition by the Postal Service of any positive residual shape surcharge would make alternate delivery companies more attractive to sample senders. If you cannot confirm, please explain fully.

USPS/AAPS-T1-14. Please see your testimony at page 48, line 4. Please fully define "highly competitive" as it is used in this passage.

USPS/AAPS-T1-15. Please confirm that the study of the cost/weight relationship for Standard (A) mail presented in exhibit USPS-44B included the vehicle service driver and transportation costs segments directly in the analysis. If you do not confirm, explain fully.

USPS/AAPS-T1-16. Please confirm that the study of the cost/weight relationship for Standard (A) mail presented in exhibit USPS-44B assumed that transportation costs were directly related to weight. If you do not confirm, please explain fully.

USPS/AAPS-T1-17. Please confirm that the study of the cost/weight relationship for Standard (A) mail presented in exhibit USPS-44B assumed that vehicle service driver costs were directly related to weight. If you do not confirm, please explain fully.

USPS/AAPS-T1-18. Please refer to the discussion of city carrier street time costs on page 37 of your testimony. Most of the discussion centers around what the Postal Service calls a park and loop route.

- a. Are you assuming that the standard operating procedure for a park and loop route is to carry all of the mail for a route in one circuit without returning to the vehicle? Please explain fully, describing any assumptions you employ.
- b. Please discuss how the hypothetical situation described at page 37 lines 7 - 21 would change if the normal park and loop route consisted of 10 separate circuits, with the carrier returning to the vehicle before each circuit.
- c. Please describe how your analysis of the effect of weight on the cost of delivery would be different for mounted routes (routes where the carrier makes each delivery from her vehicle).
- d. What percentage of deliveries by the members of your association are made by carriers on foot? What percentage are made from a vehicle?

CERTIFICATE OF SERVICE

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


Richard T. Cooper

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