

DOCKET SECTION

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

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Postal Rate and Fee Changes, 1997

Docket No. R97-1

ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
INTERROGATORIES TO
ValPak/CAROL WRIGHT WITNESS JOHN HALDI
(AAPS/VP/CW-T1-1-2)
(January 27, 1998)

Pursuant to the rules applicable to this proceeding, the Association of Alternate Postal Systems directs the following interrogatories to ValPak/Carol Wright witness Haldi:

AAPS/VP/CW-T1-1-2.

Respectfully submitted,

Bonnie S. Blair

Bonnie S. Blair
Attorney for Association of
Alternate Postal Systems

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CERTIFICATE OF SERVICE

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

January 27, 1998

Bonnie S. Blair
Bonnie S. Blair

AAPS/VP/CW-T1-1. At page 33, line 18, through page 34, line 2, you testify that because there are substantial alternatives available to standard A ECR MAIL, the Postal Reorganization Act would support a lower cost coverage.

(a) Would it therefore also be your opinion that where there are few alternatives, or no alternatives, this rate standard would support a higher cost coverage?

(b) Please identify the most important authorities that support your interpretation of Section 3622(b)(5).

AAPS/VP/CW-T1-2. Given your testimony at page 16 that the Postal Service has “failed to present any reliable evidence” on the issue of which ECR costs are pound-related and which are piece-related, and your testimony at page 52 that the weight-cost relationship “is not known with any degree of certainty,” please explain in greater detail why you have decided to “adopt the Postal Service’s proposed rate of \$0.53 per pound” rather than adopting the pound rate last approved by the Postal Rate Commission. In this answer, please explain how it is “conservative,” as you state at page D-11, to adopt Witness Moller’s proposed pound rates rather than those last approved by the Commission.