

DOCKET SECTION

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

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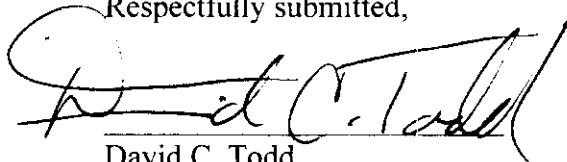
Postal Rate and Fee Changes, 1997)
_____))
_____)

Docket No. R97-1

**FIRST SET OF INTERROGATORIES
OF THE MAIL ORDER ASSOCIATION OF AMERICA
TO ASSOCIATION OF ALTERNATE POSTAL SYSTEMS
KENNETH R. BRADSTREET (AAPS-T-1)**

Pursuant to Rules 25 and 26 of the Rules of Practice and Procedure, the Mail Order Association of America (MOAA) submits its first set of interrogatories to Association of Alternate Postal Systems witness Kenneth R. Bradstreet.

Respectfully submitted,



David C. Todd
PATTON BOGGS, L.L.P.
2550 M Street, N.W.
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MOAA/AAPS-T1-1

With respect to page 5 of your testimony, is it correct to conclude that AAPS members compete with the USPS directly only for the delivery of pieces eligible for entry as ECR or high density within Standard Mail A?

MOAA/AAPS-T1-2

With reference to your testimony on page 6, please provide the total volumes of magazines and periodicals delivered by AAPS members and the volumes of other pieces (1) weighing 4 ounces and above and (2) pieces weighing less than four ounces.

MOAA/AAPS-T1-3

On page 7 of your testimony you recite certain factors which you characterize as USPS "pricing advantages." Would you agree that the fact that the USPS cannot independently set its own rates or product lines, but only pursuant to recommended decisions of the PRC represents a "pricing" disadvantage? If you disagree, please explain fully.

MOAA/AAPS-T1-4

Would you agree that the fact that the Postal Service has no independent ability to establish wages for rank and file employees, but only pursuant to binding arbitration represents a competitive disadvantage?

MOAA/AAPS-T1-5

What wage rates are paid to the employees of APS to perform the delivery function?

MOAA/AAPS-T1-6

Are AAPS member companies able to set prices for their delivery services without review by any regulatory body?

MOAA/AAPS-T1-7

Is it your testimony that the rates for saturation and high density ECI Standard Mail A should be set at levels higher than proposed by the USPS based solely on the competitive concerns expressed in your testimony?

MOAA/AAPS-T1-8

Is is your testimony that the members of AAPS have suffered significant competitive harm from competition from the USPS? If your answer is anything other than an unqualified no, please provide complete support for any claim of harm by providing a statement of collective volumes, revenues and profits for AAPS members for the years 1995 through 1997.

MOAA/AAPS-T1-9

Please provide the schedule of rates charged by APS.

MOAA/AAPS-T1-10

Please provide copies of the schedules of rates charged by AAPS members.

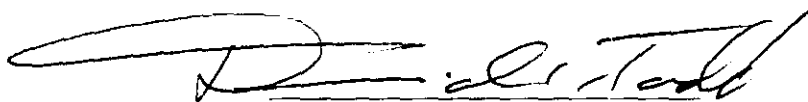
MOAA/AAPS-T1-11

On page 18 of your testimony you include the text of Section 101 of the Postal Reorganization Act. Would you not agree that the obligation of the Postal Service to "provide

prompt, reliable, and efficient services to patrons in all areas and . . . to all communities" is facilitated by the Postal Service's ability to offer services for which there is private sector competition? If your answer is anything other than an unqualified yes, please explain completely.

CERTIFICATE OF SERVICE

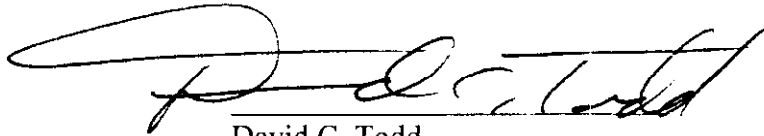
I hereby certify that I have this day served the foregoing document upon all parties requesting such service this 28th day of January, 1998, by First-Class Mail.

A handwritten signature in black ink, appearing to read "David C. Todd", written over a horizontal line.

David C. Todd
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties requesting such service this 28th day of January, 1998, by First-Class mail..

A handwritten signature in black ink, appearing to read 'D. C. Todd', with a large, stylized loop at the beginning.

David C. Todd
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