

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

_____))
POSTAL RATE AND FEE CHANGES, 1997)
_____))

RECEIVED
SEP 5 2 54 PM '97
Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS BY THE ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS TO THE UNITED STATES POSTAL
SERVICE WITNESS O'HARA
(AAPS/USPS-T30-1)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Association of Alternate Postal Systems hereby submits the attached interrogatory to the United States Postal Service witness O'Hara. If this request should be answered by a different witness, it should be referred to that witness.

Respectfully submitted,

Bonnie S. Blair
Bonnie S. Blair, Esq.
THOMPSON COBURN
700 14th Street, N.W.
Suite 900
Washington, D.C. 20005

Counsel for the Association
of Alternate Postal Systems

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

Bonnie S. Blair
Bonnie S. Blair, Esq.

Dated: September 5, 1997

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF ALTERNATE POSTAL SYSTEMS (AAPS)
TO THE UNITED STATES POSTAL SYSTEM WITNESS O'HARA (USPS-T-30)
(AAPS/USPS-T30-1)

AAPS/USPS-T30-1

You conclude on page 35 that, because the ECR subclass has a "very high cost coverage" the "rate increase does not result in unfair competition" for Postal Service competitors. In this regard, (a) please confirm that the Postal Service is proposing rate decreases of as much as 18% for certain, heavier ECR pieces? (b) please confirm that the Postal Service is proposing rate decreases even in the 4-7 ounce range, where there is substantial competition (c) please state the Postal Service's estimate of how many ECR pieces and what percentage of ECR pieces will enjoy rate decreases under this proposal, and (d) please describe what efforts the Postal Service made to determine whether the rate decreases proposed will have an adverse impact on competitors or on competition.