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

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS REDIRECTED FROM WITNESS MAYES (AAPS/USPS-T32—16)

The United States Postal Service hereby provides its response to the following interrogatory of Association of Alternate Postal Systems redirected from witness Mayes: AAPS/USPS-T32—16, filed on March 16, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony Alvergio

Attorney

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RESPONSE OF UNITED STATES POTSAL SERVICE TO INTERROGATORY OF ASSOCIATION OF ALTERNATE POSTAL SYSTEMS REDIRECTED FROM WITNESS MAYES

AAPS/USPS-T32-16. You state in response to AAPS/USPS-T32-4 that other providers of delivery service are not required to reveal their cost structures, rate application, pricing and other practices. Isn't that why the Postal Service contracted with SAI for the various reports concerning other delivery services? Didn't other delivery services cooperate by providing information to SAI?

RESPONSE:

The purpose of SAI research is to provide the Postal Service with a broad sense of the alternate delivery market, and understanding pricing is one component of such research.

Interviews with other firms are a means of collection of information, but there is no mechanism to control for the accuracy of the information provided by such sources.

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.

Anthony Alverno

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