

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

RECEIVED
MAR 20 4 36 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

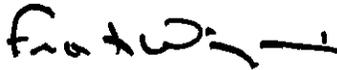
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS TAYMAN
(PostCom/USPS-T-9-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Tayman: PostCom/USPS-T-9-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

PostCom/USPS-T-9-2. Please refer to witness Kingley's response to NAA/USPS-T-10-1, b. There she says, "I am told that the DPS work hour savings budgeted for carrier in-office time from FY 99 to FY 01 are:

FY 99: 4.6 million workhours

FY 00: 9.6 million workhours

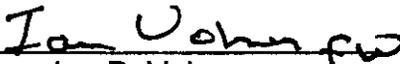
FY 01: 4.2 million workhours"

(a) Please provide a derivation of these saving from those you show in LR-I-126, citing the programs comprising these savings.

(b) If you cannot provide a reconciliation, please explain why and provide the correct saving for each Fiscal Year.

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.



Ian D. Volner