

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 WITNESS KASHANI  
TO INTERROGATORIES OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
(REDIRECTED FROM WITNESS TAYMAN)  
(DMA/USPS-T9-20-21)

The United States Postal Service hereby provides the responses of witness Kashani to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T9-20-21, filed on January 28, 2000, and redirected from witness Tayman.

Each 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

  
Susan M. Duchek

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February 11, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KASHANI  
TO INTERROGATORIES OF  
DIRECT MARKETING ASSOCIATION, INC.  
(Redirected from Witness Tayman, USPS-T-9)**

**DMA/USPS-T9-20** Please provide a spreadsheet showing the distribution of cost reduction programs to class and subclass for FY 2000 and TYAR.

**RESPONSE**

The following charts 1 and 2 provide references to pages in my Workpapers where the distribution of cost reductions by class and subclass for FY 2000 and TYAR are displayed, respectively. Electronic version of my Workpapers WP-E and WP-I are available on CD-ROM in USPS-LR-I-6.

**Chart 1. Page References to FY 2000 Cost Reductions by Class and Subclass**

SEG	DESCRIPTION	FY 2000 COST REDUCTIONS 1)	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
2	Supervisors & Technical Personnel	(45,906)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 87-88	PP. 101-102,117-118,131-132,161-162,175-176,187-188,203-204
3	Clerks & Mailhandlers, CAG A-J, SD Mess Personnel	(441,793)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 219-220	PP. 233-234,257-258,271-272,287-288
6&7	City Delivery Carriers Personnel	(400,355)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 311-312 AND 341-342	PP. 311-312,325-326,341-342
11	Operating Equip. Maintenance Personnel	(13,299)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 379-380	PP. 405-406
14	Domestic Air	(105,163)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 607-608	PP. 607-608
	Domestic Highway	(9,489)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 607-608	PP. 607-608
	Domestic Rail	(2,773)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 607-608	PP. 607-608
	International	38,200	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 622-623	PP. 622-623
<b>Totals</b>		<b>(980,578)</b>			

1/ Exhibit USPS14A, PP. 3-4

**DMA/USPS-T9-20 (Continued)**

**Chart 2. Page References to TY 2001AR Cost Reductions by Class and Subclass**

SEG	DESCRIPTION	FY 2001AR COST REDUCTIONS 2/	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
3	Clerks & Mailhandlers, CAG A-J , SD Mess Personnel	(475,373)	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 188-189	PP. 201-202,225-226
6&7	City Delivery Carriers Personnel	(151,373)	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 271-272 AND 301-302	PP. 271-272, 285-286,301-302
11	Operating Equip. Maintenance Personnel	(1,673)	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 339-340	PP. 365-366
14	Domestic Highway	(44,404)	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 559-560	PP. 559-560
	Domestic Rail	(1,122)	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 559-560	PP. 559-560
	International	20,000	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 571-572	PP. 571-572
	<b>Totals</b>	<b>(653,945)</b>			

2/ Exhibit USPS14A, PP. 7-8.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KASHANI  
TO INTERROGATORIES OF  
DIRECT MARKETING ASSOCIATION, INC.  
(Redirected from Witness Tayman, USPS-T-9)**

**DMA/USPS-T9-21** Please provide a spreadsheet showing the distribution of other programs to class and subclass for FY 2000 and TYAR.

**RESPONSE**

The following charts provide references to pages in my Workpapers where the distribution of other programs by class and subclass for FY 2000 and TYAR are displayed, respectively. Electronic version of my Workpapers WP-E and WP-I are available on CD-ROM in USPS-LR-I-6.

DMA/USPS-T9-21 (Continued)

Page References to FY 2000 Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2000 OTHER PRGRMS 1)	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
2	Supervisors & Technical Personnel	(8,493)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 89-90	PP. 103-104,133-134,177-178,189-190,205-206
3	Clerks & Mailhandlers, CAG A-J, SD Mess Personnel	59,839	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 221-222	PP. 235-236,259-260,273-274,289-290
6&7	City Delivery Carriers Personnel	13,876	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 343-344	PP. 327-328
11	Operating Equip. Maintenance Personnel	32,003	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 381-382	PP. 407-408
	Contract Cleaners	(9)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 381-382	PP. 419-420
12	Vehicle Supplies & Materials	(5,000)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 433-434	PP. 471-472,485-486
13	Freight - Supplies & Materials	(1,426)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 523-524	PP. 549-550
	Banking Fees	(48)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 523-524	PP. 557-558
	Carfare	(11)	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 523-524	PP. 583-584
14	Domestic Air	56,100	WORKPAPER WP-E, VOLUME 1 OF 2	PP. 609-610	PP. 609-610
15	Rent	(1,875)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 645-646	PP. 645-646
	Product Specific Imputed Rent	5,226	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 645-646	PP. 645-646
	Heating Fuel	(35)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 657-658	PP. 657-658
	Utilities	(643)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 657-658	PP. 657-658
	Communications	4,547	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 657-658	PP. 657-658
	Building Projects Expensed	(25,290)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 657-658	PP. 657-658
	Moving Expense	(14)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 669-670	PP. 669-670
16	ADP Supplies & Services	(71,726)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 689-690	PP. 689-690
	Equipment Repair & Maintenance Excluding ADP	139,338	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 689-690	PP. 689-690
	Custodial Supplies & Services	(65)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 689-690	PP. 689-690
	Miscellaneous Supplies & Services	(59,078)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 711-712	PP. 711-712
	Printing & Reproduction	(3,499)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 699-700	PP. 699-700
	Stamps & Accountable Paper	(11,082)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 699-700	PP. 699-700

DMA/USPS-T9-21 (Continued)

Page References to FY 2000 Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2000 OTHER PRGRAMS 1)	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
16	Money Orders	(287)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 699-700	PP. 699-700
	Operating Equipment & Supplies	(26,097)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 711-712	PP. 711-712
	Expedited Mail Supplies	(46,383)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 711-712	PP. 711-712
	Other Postal Supplies and Services	4,675	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 711-712	PP. 711-712
	Tracking & Tracing/Delivery Confirmation	11,275	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 711-712	PP. 711-712
	Advertising & Sales Promotion	(120,200)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 681-682	PP. 681-682
	Stamped Envelopes	(693)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 699-700	PP. 699-700
17	Research & Development Contracts	(18,238)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 729-730	PP. 729-730
18	Unemployment Compensation	9,600	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 787-788	PP. 787-788
	Holiday Leave	1,592	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 763-764	PP. 763-764
	Workers' Compensation Health Benefits	1,200	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 787-788	PP. 787-788
	Annuitant Life Insurance	400	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 775-776	PP. 775-776
	Repricing of Annual Leave	35,294	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 763-764	PP. 763-764
	CSRS Annuitant Cola	79,593	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 775-776	PP. 775-776
	CSRS Retirement Liabilities Current	39,992	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 763-764	PP. 763-764
	CSRS Retirement Liabilities Prior	71,432	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 763-764	PP. 763-764
	Workers' Compensation Current	29,970	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 775-776	PP. 775-776
	Workers' Compensation Prior	72,546	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 787-788	PP. 787-788
	Annuity Protection Program	(200)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 795-796	PP. 795-796
	Annuitant Health Benefits	145,458	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 775-776	PP. 775-776
	Supplies & Services	(10,417)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 795-796	PP. 795-796
	Miscellaneous Support Cost	(93,599)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 795-796	PP. 795-796
Inspection Service Expenses	(27)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 795-796	PP. 795-796	
POD Workers' Comp	(1,195)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 787-788	PP. 787-788	

DMA/USPS-T9-21 (Continued)

Page References to FY 2000 Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2000 OTHER PRGRAMS 1\	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
19	Contract Training Support	(1,083)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 811-812	PP. 811-812
20	Vehicle Depreciation	(19,635)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 821-822	PP. 841-842
	Equipment Depreciation	5,423	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 821-822	PP. 847-848
	Building Depreciation & Amortization	82,502	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 821-822	PP. 853-854
	Disposition of Property	(13,472)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 831-832	PP. 831-832
	Interest on Debt	28,375	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 859-860	PP. 859-860
	Interest on Retirement Liabilities	(19,358)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 859-860	PP. 859-860
	Other Interest	(85)	WORKPAPER WP-E, VOLUME 2 OF 2	PP. 865-866	PP. 865-866
Totals		370,993			

DMA/USPS-T9-21 (Continued)

Page References to TY 2001AR Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2001AR OTHER PROGRAMS 1/	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
3	Clerks & Mailhandlers, CAG A-J, SD Mess Personnel	9,808	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 189-190	PP. 203-204
6&7	City Delivery Carriers Personnel	19,797	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 303-304	PP. 287-288
11	Operating Equip. Maintenance Personnel	29,352	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 341-342	PP. 367-368
	Contract Cleaners	6	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 341-343	PP. 379-380
13	Freight - Supplies & Materials	951	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 477-478	PP. 503-504
	Banking Fees	32	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 477-478	PP. 511-512
	Carfare	7	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 477-478	PP. 537-538
14	International	18,829	WORKPAPER WP-I, VOLUME 1 OF 2	PP. 573-574	PP. 573-574
15	Rent	1,376	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 595-596	PP. 595-596
	Product Specific Imputed Rent	1,711	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 595-596	PP. 595-596
	Heating Fuel	23	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 607-608	PP. 607-608
	Utilities	823	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 607-608	PP. 607-608
	Communications	3,249	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 607-608	PP. 607-608
	Building Projects Expensed	(76)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 607-608	PP. 607-608
	Moving Expense	10	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 619-620	PP. 619-620
16	ADP Supplies & Services	19,210	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 639-640	PP. 639-640
	Equipment Repair & Maintenance Excluding ADP	4,980	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 639-640	PP. 639-640
	Custodial Supplies & Services	44	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 639-640	PP. 639-640
	Miscellaneous Supplies & Services	(9,370)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 661-662	PP. 661-662
	Printing & Reproduction	2,333	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 649-650	PP. 649-650
	Stamps & Accountable Paper	47,388	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 649-650	PP. 649-650
	Money Orders	191	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 649-650	PP. 649-650
	Operating Equipment & Supplies	12,064	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 661-662	PP. 661-662
	Expedited Mail Supplies	35,657	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 661-662	PP. 661-662



DMA/USPS-T9-21 (Continued)

Page References to TY 2001AR Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2001AR OTHER PROGRAMS 1)	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
16	Other Postal Supplies and Services	9,443	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 661-662	PP. 661-662
	Tracking & Tracing/Delivery Confirmation	(7,398)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 661-662	PP. 661-662
	Advertising & Sales Promotion	120,200	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 631-632	PP. 673-674
	Stamped Envelopes	462	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 649-650	PP. 649-650
17	Research & Development Contracts	135	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 679-680	PP. 679-680
18	Unemployment Compensation	2,800	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 737-738	PP. 737-738
	Holiday Leave	(388)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 713-714	PP. 713-714
	Workers' Compensation Health Benefits	600	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 737-738	PP. 737-738
	Annuitant Life Insurance	900	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 725-726	PP. 725-726
	Repricing of Annual Leave	(5,522)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 713-714	PP. 713-714
	CSRS Annuitant Cola	74,910	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 725-726	PP. 725-726
	CSRS Retirement Liabilities Current	(24,526)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 713-714	PP. 713-714
	CSRS Retirement Liabilities Prior	84,685	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 713-714	PP. 713-714
	Workers' Compensation Current	41,079	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 725-726	PP. 725-726
	Workers' Compensation Prior	(12,689)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 737-738	PP. 737-738
	Annuity Protection Program	(200)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 745-746	PP. 745-746
	Annuitant Health Benefits	108,826	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 725-726	PP. 725-726
	Supplies & Services	6,411	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 745-746	PP. 745-746
	Miscellaneous Support Cost	39,177	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 745-746	PP. 745-746
Inspection Service Expenses	18	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 745-746	PP. 745-746	
POD Workers' Comp	(1,265)	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 737-738	PP. 737-738	
19	Contract Training Support	722	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 761-762	PP. 761-762
20	Vehicle Depreciation	69	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 791-792	PP. 791-792
	Equipment Depreciation	232,074	WORKPAPER WP-I, VOLUME 2 OF 2	PP. 797-798	PP. 797-798

DMA/USPS-T9-21 (Continued)

Page References to TY 2001AR Other Programs by Class and Subclass

SEG	DESCRIPTION	FY 2001AR OTHER PROGRAMS 1\	SOURCE	TOTAL COST REDUCTION DISTRIBUTION BY CLASS AND SUBCLASS	COST REDUCTION DISTRIBUTION BY COMPONENT BY CLASS AND SUBCLASS
20	Building Depreciation & Amortization	57,990	WORKPAPER WP-1, VOLUME 2 OF 2	PP. 803-804	PP. 803-804
	Disposition of Property	(7,734)	WORKPAPER WP-1, VOLUME 2 OF 2	PP. 781-782	PP. 781-782
	Interest on Debt	53,100	WORKPAPER WP-1, VOLUME 2 OF 2	PP. 809-810	PP. 809-810
	Interest on Retirement Liabilities	29,096	WORKPAPER WP-1, VOLUME 2 OF 2	PP. 809-810	PP. 809-810
	Other Interest	56	WORKPAPER WP-1, VOLUME 2 OF 2	PP. 815-816	PP. 815-816
Totals		1,001,426			

## DECLARATION

I, Cameron Kashani, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Cameron Kashani

Dated: 2/11/2000

## 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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written above a solid horizontal line.

Susan M. Duchek

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February 11, 2000