

**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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS SMITH
(POSTCOM/USPS-T-21-1-2)**

Pursuant to Sections 25 and 26 of the rules of practice, Association for Postal Commerce submits the attached interrogatories to USPS witness Smith (POSTCOM/USPS-T-21-1-2). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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POST COM/USPS-T-21-1. Please refer to Attachment 1 to DMA/USPS-T-21-2.

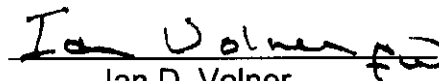
Supply the same information, as it is estimated, for FY99, FY00 and FY01.

POST COM/USPS-T-21-2. Please refer to your response to DMA/USPS-T-21-2(e).

- a. By whom were you "told that the decline in the FFM 881 productivity may reflect the increase[d] focus on service"?
- b. What do you interpret the phrase "increase[d] focus on service" to mean?

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

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