

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
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS TAYMAN**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Tayman: DMA/USPS-T9, Nos. 35-47. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

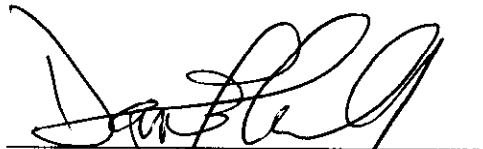


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CERTIFICATE OF SERVICE

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



Dana T. Ackerly II

Dated: February 17, 2000

DMA/USPS-T9-35. Please confirm that there are no cost reduction programs affecting C/S 16 in FY 2000 or TYAR. If you do not confirm, please provide details.

DMA/USPS-T9-36. Did you or your staff prepare any analysis, decision memos, options analyses, briefings, etc. relating to the contingency for this rate case? If so, please provide each and indicate (1) the date it was prepared and, (2) the titles of those on the distribution list to whom each was distributed.

DMA/USPS-T9-37. Please refer to your response to ANM/USPS-T9-7. Please explain how the six factors you list provide the basis for determining asset lives.

DMA/USPS-T9-38. Please provide all information you have on manufacturer's recommendations concerning asset lives.

DMA/USPS-T9-39. Please provide all information you have on industry standards pertaining to asset lives.

DMA/USPS-T9-40. Please provide all USPS records, which support your selection of asset lives.

DMA/USPS-T9-41. Please provide all maintenance standards pertaining to asset lives.

DMA/USPS-T9-42. Please refer to your response to DMA/USPS-T9-12. Is the Postal Service a subscriber to DRI. If so, how often does DRI update the forecasts they supply to you? May we infer from your response that you have not received a more recent forecast?

DMA/USPS-T9-43. Are there sources of change other than the ones you describe on page 11, lines 21-24 of your testimony? If so, please describe them and provide documentation and citations for each.

DMA/USPS-T9-44. Does the Postal Service consider salvage value in estimating depreciation for a newly purchased asset? If so, please explain where this is reflected in the spreadsheets used to estimate depreciation.

DMA/USPS-T9-45. Please confirm that there are no "Other Programs" for Y2K in FY 2000 and in TYAR. If you do not confirm, please provide references to where they are described in LR-I-126 and where they appear in PRG ANAL-revised.XLS.

DMA/USPS-T9-46. Please refer to your response to DMA/USPS-T9-9. Please define the term "Work Related Work Years."

DMA/USPS-T9-47. On page 45 of your testimony you say "The Postal Service's financial performance is under much greater pressure and is subject to substantially greater risks than it was at the time of the last two omnibus rate cases." Did you perform any studies which quantified "greater pressure" or "greater risks"? Please list all factors

with respect to which the Postal Service is under “greater pressure” or “subject to substantially greater risks.”