

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

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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-9-1)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatory to USPS witness Tayman PostCom/USPS-T-9-1. 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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PostCom/USPS-T-9-1. Are labor costs associated with the installation of FSM/AFSM equipment characterized (i) in whole or (ii) in part as "maintenance" as that term is used in LR-I-126?

(a) If your answer is affirmative, has there been, or do you project there to be, a decrease in installation-related maintenance costs in any of FY 99, 00, 01?

(b) If your answer to sub-part (a) is affirmative, how do you account for that decrease in a year in which it occurs and any subsequent year? Please provide an example.

(c) If your affirmative answer is "in part" explain how and why such costs are so characterized and how and why that part which is not so characterized is characterized.

(d) If your answer is "no", where are such costs reflected?

## 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