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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

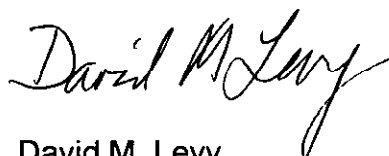
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Docket No. R2000-1
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Postal Rate and Fee Changes, 2000
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**SECOND INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS SMITH (ANM/USPS-T21-10-14)**

Pursuant to section 20 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness Marc A. Smith (USPS-T-21). ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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March 10, 2000

QUESTIONS

ANM/USPS-T21-10. Please refer to LR-I-83, p. I-5. In the row labeled "FSM 1000," please explain the source and meaning of the numbers shown in columns 1-3.

(a) Are these numbers (807, 942 and 1,150 respectively) intended to represent the number of FSM 1000s deployed? If so, please reconcile with witness Kingsley's statement (USPS-T10, p.11) that the number of FSM 1000s deployed is 340, with no plans to increase that number.

(b) If these numbers in the above-referenced row do not refer to the number of FSM 1000s, how should they be interpreted?

(c) Do the 1,150 FSMs deployed at the end of FY 98 (column 3) consist of 812 FSM 881s and 338 FSM 1000s? Please explain any negative answer

ANM/USPS-T21-11. Please refer to LR-I-83. On p. I-12, in column 1 you show the square feet per FSM and in column 5 the number of FSMs deployed in mid-FY 01. Multiplying the number of FSMs times the square feet per FSM yields a total of 3,945,248 square feet. Please reconcile this number with the 6,126,832 square feet shown at p. I-14, line 18, column 1.

ANM/USPS-T21-12. In LR-I-83, p. I-12, you show a total of 175 AFSM 100s deployed by the end of FY 01. Another library reference, LR-I-126, p. 18, under the sections "Accelerate FSM Buy Into 2001" and "Additional Advanced Flat Sorter Machine (AFSM) To Upper Bound," computes savings/costs for the roll-forward model for an

additional 88 AFSM 100s. Please reconcile your assumed deployment of 175 AFSM 100s with the data and information shown in LR-I-126 for accelerating the FSM buy and acquiring an additional 88 AFSM 100s.

ANM/USPS-T21-13. How many plant and distribution centers (“P&DCs”) did the Postal Service have in FY 1998?

ANM/USPS-T21-14. Of the total number of P&DCs which the Postal Service had in FY 1998, (i) how many had separate, unattached warehouse space for offloading and temporarily holding mail until the P&DC was ready to process the mail, and (ii) how many regularly used trailers or vans to store mail until the plant was ready to process the mail? If you do not have precise data, provide the best information or estimate available.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy

March 10, 2000