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

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POSTACAL EL ACTUACIÓN DA GERROL OF TELLACIÓN ALXXY

Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

## 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. 48-50. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

Dana T. Ackerly II, Esq. COVINGTON & BURLING 1201 Pennsylvania Avenue, N.W. Washington, D.C. 20004-2401 (202) 662-5296

Counsel for the Direct Marketing Association, Inc.

## **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: March 15, 2000

**DMA/USPS-T9-48**. Please refer to your response to the interrogatory of the Direct Marketing Association (DMA/USPS-T9-27), which discusses the purchases and sales of land and buildings.

a. Please provide an electronic spreadsheet showing the price the Postal Service received in each sale of land and buildings for each of the last ten years. For each sale, please also provide the year of purchase, the year of sale, the purchase price, and the book value at the time of sale.

**DMA/USPS-T9-49**. Please refer to your response to ANM/USPS-T9-22. There you say, "Savings differences still exist since the Phase I purchase is to supplement current FSM capacity (thereby reducing manual flat volumes) and the Phase II purchase will be to replace existing FSM 881s.

- a. Please confirm that Phase I savings are 15,694 hours per machine.
- b. Please confirm that Phase II savings are 29,727.3 hours per machine. If you can not confirm, please provide the correct number for savings per machine.
- c. Please explain why replacing manual sorting (Phase I) does not confer greater savings per machine than replacing mechanized or automated savings.

**DMA/USPS-T9-50**. Please refer to your response to ANM/USPS-T9-22. Please explain why the Postal Service would implement a less productive program before it implements a more productive program.