

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

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POSTAL RATE COMMISSION
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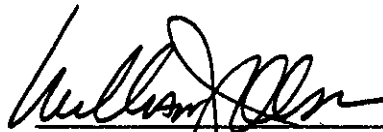
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS KAREN MEEHAN (APMU/USPS-T11-15-18)
(March 23, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Association of Priority Mail Users, Inc. hereby submits interrogatories and requests for production of documents. If necessary, please redirect any interrogatories and/or requests to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

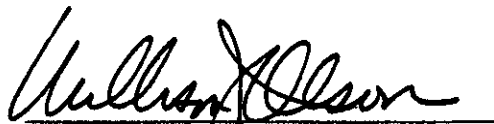
McLean, Virginia 22102-3860

(703) 356-5070

Counsel for Association of Priority Mail Users, Inc.

CERTIFICATE OF SERVICE

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


William J. Olson

March 23, 2000

APMU/USPS T-11-15.

Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that **overtime pay costs** are used to calculate Cost Component 433 — All salaries plus other personnel costs from cost segments 13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

APMU/USPS T-11-16.

Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that the **night differential costs** are used to calculate Cost Component 433 — All salaries plus other personnel costs from cost segments 13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

APMU/USPS T-11-17.

Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that **holiday pay costs** are used to calculate Cost Component 433 — All salary plus other personnel costs from cost segments 13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

APMU/USPS T-11-18.

Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that **salary costs of non-bargaining unit employees** are used to calculate Cost Component 433 — All

salaries plus other personnel costs from cost segments 13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm please explain.