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

Mar 23 4 54 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

# ASSOCIATION OF PRIORITY MAIL USERS, INC. FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE <u>WITNESS CAMERON KASHANI (APMU/USPS-T14-1-2)</u> (March 23, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission,

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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.

Villiam J. Ofson

March 23, 2000

#### APMU/USPS T-14-1.

On page 4 (1. 22) of your testimony, you identify the additional workday adjustment as the fourth step in estimating future year costs. Please explain how an additional workday affects the level of costs in the test year for cost components: 18.3.1, repriced annual leave; 18.3.1, holiday leave; 18.3.2, civil service retirement; 18.3.4, workers compensation; 18.3.5, unemployment compensation; 18.3.6, retiree health benefits; 18.3.7, annuitant life insurance; and 18.3.8, annuitant COLA/ principal. For each of the cost components, please identify references in workpapers, library references and testimony supporting your answers.

### APMU/USPS T-14-2.

On page 4 (1. 21) of your testimony, you identify the volume level adjustment as the second step in estimating future year costs. Please explain how mail volume level affect costs in the test year for cost components: 18.3.1, repriced annual leave; 18.3.1, holiday leave; 18.3.2, civil service retirement; 18.3.4, workers compensation; 18.3.5, unemployment compensation; 18.3.6, retiree health benefits; 18.3.7, annuitant life insurance; and 18.3.8, annuitant COLA/principal. For each of the cost components, please identify references in workpapers, library references and testimony supporting your answers.

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