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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

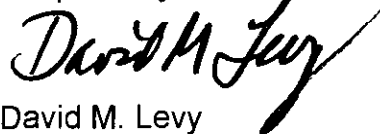
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Docket No. R2000-1
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Postal Rate and Fee Changes, 2000
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**EIGHTH INTERROGATORIES
OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS TAYMAN (ANM/USPS-T9-70-74)**

The Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness William P. Tayman (USPS-T-9). ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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March 23, 2000

QUESTIONS

ANM/USPS-T9-70. Please refer to your answer to ANM/USPS-T9-9. Your answer alludes to the creation of a "new forecasting organization within [the Postal Service's] Finance function in Fiscal Year 1999," but fails to identify any "standards" or "policies" responsive to the question. Please identify every change in standards or policies adopted by the Postal Service since July 1, 1998, to increase the accuracy and reliability of its test year revenue requirement projections.

ANM/USPS-T9-71. Please refer to ANM/USPS-T9-7(f) and its follow-up, ANM/USPS-T9-34. These questions sought, among other things, any studies, analyses, and other documents that support the asset lives assumed in the Postal Service's cost studies. In response to ANM/USPS-T9-34, you state:

It is my understanding that service life estimates are developed at the time of the initial equipment buy in conjunction with the criteria defined in my response to ANM/USPS-T9-7(f). A review of the response to ANM/USPS-T9-33 which provides a listing of certain assets and their services lives and salvage values should be sufficient for a third party to assess the reasonableness of established asset lives.

(a) When "service life estimates are developed at the time of the initial equipment buy," are any documents generated that reveal the analysis or assumptions underlying those estimates? If so, please produce them.

(b) Please confirm that the only information produced in "response to ANM/USPS-T9-33" is Library Reference LR-I-224, Personal Property and Motor Vehicle Asset Life Listing.

(c) Please confirm that LR-I-224 does not reveal the lives, survivor curves or retirement history actually experienced by the Postal Service for any asset or group of assets.

(d) Please provide the survivor curve actually experienced by the Postal Service for each line entry in LR-I-224.

ANM/USPS-T9-72. Please refer to ANM/USPS-T9-36, which asked you to produce the documents requested to ANM/USPS-T9-9, or verify that no responsive documents exist. In response to ANM/USPS-T9-36, you state that "I am unaware that any such documents exist." Please confirm that a search was made for such documents among the personnel and departments most likely to possess them if they exist.

ANM/USPS-T9-73. Please refer to ANM/USPS-T9-44(d). Your answer is "I am unaware of any studies or analyses related to limiting the size of the mail processing work force." Please confirm that a search was made for such documents among the personnel and departments most likely to possess them if they exist.

ANM/USPS-T9-74. Please refer to ANM/USPS-T10-28. Your answer is "I am unaware of any studies." Please confirm that a search was made for such studies among the personnel and departments most likely to possess them if they exist.

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.



March 23, 2000