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

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

DOCKET NO. R2000-1

FIRST INTERROGATORY OF PARCEL SHIPPERS ASSOCIATION TO UNITED STATES POSTAL SERVICE WITNESS MARC SMITH (USPS-T21-1)

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following interrogatory and request for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

Timothy J. May Patton Boggs LLP

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Counsel for Parcel Shippers Association

Dated: March 23, 2000

FIRST INTERROGATORY OF PARCEL SHIPPERS ASSOCIATION TO UNITED STATES POSTAL SERVICE WITNESS MARC SMITH

PSA/USPS-T21-1

Having reference to your response to POIR 4, for each year from 1989 to 1999 please provide an electronic spreadsheet showing total Standard B parcel processing productivity, manual parcel processing productivity, the productivity in parcel sorting machines, and SPBS productivity.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.

Timothy J. May

Dated: March 23, 2000