

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

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Postal Rate and Fee Changes, 2000)
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Docket No. R2000-1

**AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
JOINT FOLLOW-UP INTERROGATORIES TO USPS WITNESS SMITH
(ABA&NAPM/USPS-T21-37-46)**

(March 27, 2000)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Bankers Association (ABA) and the National Association of Presort Mailers (NAPM) hereby submit these joint follow-up interrogatories and requests for the production of documents. These interrogatories follow-up on Smith responses to ABA&NAPM joint interrogatories, which responses were filed on Friday, March 17, 2000 and were not received by ABA or NAPM until Monday, March 20, 2000 at the earliest. The instructions included with ABA&NAPM interrogatories ABA&NAPM/USPS-T24-1-24 are hereby incorporated by reference.

ABA&NAPM/USPS-T21-37

Please refer to your response to ABA&NAPM/USPS-T21-2. For the classifications of piggyback factors you do have, "by cost pool ... or by subclass" for R97-1 and R2000-1, in each instance where they are not identical please list the values for R97-1 and R2000-1 in a table, and please explain whether the change is due to wage rates or other factors. If other factors, please explain what other factor(s).

ABA&NAPM/USPS-T21-38

Please refer to your response to ABA&NAPM/USPS-T21-3. On page 2 of your response you state that you “do not have estimates for columns 3 and 4 by cost pool”. For test year before rates costs, how do you estimate these costs if not by cost pool?

ABA&NAPM/USPS-T21-39

Please refer to your response to ABA&NAPM/USPS-T21-4. With regard to your response to a., have you used single piece letter costs (other than directly measured metered letter costs) in any way in your testimony, and if so in what ways? With regard to your response to b., is your data for BMM taken from sources which directly measure BMM costs, or is your data taken from sources which measure (i) single piece non-metered letter costs or (ii) single piece metered letter costs, which you then infer are good proxies for BMM?

ABA&NAPM/USPS-T21-40

Please refer to your response to ABA&NAPM/USPS-T21-17. Please answer the question as to why a residential rent index is used to escalate commercial/warehousing facility space. Are you applying a DRI residential rent escalator from FY1992 forward, as indicated at page 12, line 6 of your testimony, or are you apply the DRI index from FY1996 forward as indicated in your response? With response to your answer to c., for this case and R97-1 and R94-1 and MC95-1, which costs have been the binding costs actually used as costs in the case, the historical costs, or the DRI adjusted imputed rent costs? If you have only calculated these for FY1992 and FY1998, how do you know for costing purposes whether to use the book cost cap, or the imputed rent figure?

ABA&NAPM/USPS-T21-41

Please refer to your response to ABA&NAPM/USPS-T21-20. Please answer the question on volume variability changes between this and the last rate case, subject matter which appears to be within the scope of your testimony from page 1, lines 4-7. Provide the differences in mail processing equipment related volume variabilities between this case and R97-1, and explain what factor(s) account for the difference. If you are unable to do so, please refer the question to a witness who can answer it.

ABA&NAPM/USPS-T21-42

Please refer to your response to ABA&NAPM/USPS-T21-24. You state there is IOCS data for automation letters. Is it available by rate category and if so which ones?

ABA&NAPM/USPS-T21-43

Please refer to your response to ABA&NAPM/USPS-T21-29. If your answer means each RBCS site is increasing its facility space by 13%, please explain why, e.g. addition of more keying in operations. If your answer means something different, please explain what it means.

ABA&NAPM/USPS-T21-44

Please refer to your response to ABA&NAPM/USPS-T21-30. Does your answer indicate that more attention is being paid by the postal Service to improving productivity for Standard A mail than for First Class workshared letter mail?

ABA&NAPM/USPS-T21-45

Please refer to your response to ABA&NAPM/USPS-T21-31. a.. This question asked you about piggybacks for certain carrier costs in your Attachment 11, not mail processing costs. Please answer the question or refer it to a witness who can.

ABA&NAPM/USPS-T21-46

Please refer to your response to ABA&NAPM/USPS-T21-32. a. Please answer the question asked.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
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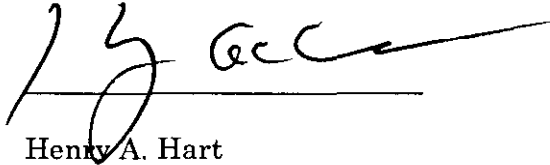
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CERTIFICATE OF SERVICE

I hereby certify that I have this date caused the foregoing document to be served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



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