POSTAL RATE AND FEE CHANGES, 2000   Docket No. R2000-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS SMITH
(PostCom/USPS-T-21-3)

Pursuant to Sections 25 and 26 of the rules of practice, the Association

for Postal Commerce submits the attached interrogatories to USPS witness

Smith: PostCom/USPS-T-21-3. If the designated witness is unable to respond to

any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

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PostCom/USPS-T-21-3.   In your response to ANM/USPS-T-21-11, you rely on USPS-LR-G-120 of Docket No. R94-1 as support for adding 34.66 % additional space to the "4,537,035 square feet of total WSU for Test Year FSM equipment."

(a)   Please disclose your understanding of how the "apportionment or share of the space for these support purposes" was calculated in USPS-LR-G-120 and your understanding of the rational for that distribution.

(b)   Are you clear that the USPS-LR-G-120 calculation does not include the "15 percent additional space for staging of mail" to which your answer refers?

(i)   If so, explain the basis for this conclusion.

(ii)   If not, explain why the inclusion of the 15 percent factor is appropriate.

(c)   You say that the number "6,126,832 shown at page I-14, line 18, column 1" is "virtually the same" as the number derived by multiplying 1.3466 by 4,557,035. If your answer to the ANN interrogatory accurately describes your analysis, why are the numbers not identical?

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

Ian D. Volner
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