

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

RECEIVED
APR 4 4 23 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS TAYMAN TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T9-49-50)

The United States Postal Service hereby provides the responses of witness Tayman to the following interrogatories of the Direct Marketing Association, Inc.:
DMA/USPS-T9-49-50, filed on March 15, 2000.

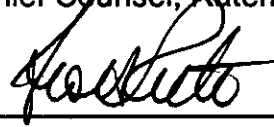
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
April 4, 2000

**RESPONSE OF WITNESS TAYMAN TO INTERROGATORIES OF
DIRECT MARKETING ASSOCIATION, INC.**

DMA/USPS-T9-49. Please refer to your response to ANM/USPS-T9-22. There you say, "Savings differences still exist since the Phase I purchase is to supplement current FSM capacity (thereby reducing manual flat volumes) and the Phase II purchase will be to replace existing FSM 881s.

- (a) Please confirm that Phase I savings are 15,694 hours per machine.
- (b) Please confirm that Phase II savings are 29,727.3 hours per machine. If you can not confirm, please provide the correct number for savings per machine.
- (c) Please explain why replacing manual sorting (Phase I) does not confer greater savings per machine than replacing mechanized or automated savings.

RESPONSE:

- (a) Not confirmed. Please see Table I that accompanies the response to MPA/USPS-T9-1. The savings for Phase I are 26,439 hours per machine; the sum of the savings for "Automated Flat Sorting Machine (AFSM)" and "Additional Automated Flat Sorter Machine (AFSM) To Upper Bound."
- (b) Confirmed.
- (c) It is my understanding that flat sorting productivities are shown in USPS LR-I-90. USPS-LR-I-90 shows high manual productivities in the delivery units and Phase I replaces those productivities. Phase II on the other hand, eliminates the rehandling of 881 BCR and OCR rejects with their associated lower productivities. Thus, greater savings are confirmed on Phase II than on Phase I.

**RESPONSE OF WITNESS TAYMAN TO INTERROGATORIES OF
DIRECT MARKETING ASSOCIATION, INC.**

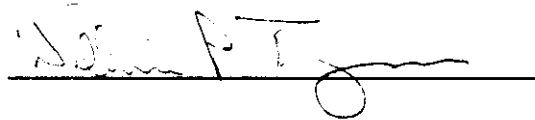
DMA/USPS-T9-50. Please refer to your response to ANM/USPS-T9-22. Please explain why the Postal Service would implement a less productive program before it implements a more productive program.

RESPONSE:

Please refer to the revised response to ANM/USPS-T9-22. Also, when comparing the savings from Phase I versus Phase II, it is important to keep in mind the fact that the two Phases did not exist simultaneously; the Postal Service did not choose Phase I over Phase II. Additionally, as Phase II comes into existence, there may be enhancements and modifications that were not possible during Phase I.

DECLARATION

I, William P. Tayman, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "William P. Tayman", is written over a solid horizontal line. The signature is cursive and somewhat stylized.

Dated: 4-24-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
April 4, 2000