

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, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SMITH TO INTERROGATORY OF
PARCEL SHIPPERS ASSOCIATION
(PSA/USPS-T21-1)

The United States Postal Service hereby provides the response of witness Smith to the following interrogatory of PSA: PSA/USPS-T21-1, filed on March 23, 2000.

The 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



Eric P. Koetting

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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SMITH
TO INTERROGATORY OF PARCEL SHIPPERS ASSOCIATION**

PSA/USPS-T2I-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.

Response:

The response to this request, as summarized below, will be provided in USPS-LR-I-291. This response does not include "total Standard B parcel processing productivities" for any of the years and it does not include parcel sorting machine productivities and BMC manual parcel sorting productivities for FY89. I do not have any productivities for "total Standard B parcel processing." In addition, I was unable to obtain FY89 productivities for BMC operations.

DECLARATION

I, Marc A. Smith, hereby declare, under penalty of perjury, that the foregoing Docket No. R2000-1 interrogatory responses are true to the best of my knowledge, information, and belief.

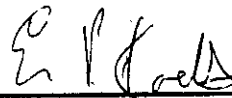


Marc A. Smith

4/6/2000
Date

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.



Eric P. Koetting

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