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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**SECOND INSTITUTIONAL INTERROGATORIES
AND DOCUMENT REQUESTS
OF ALLIANCE OF NONPROFIT MAILERS
TO UNITED STATES POSTAL SERVICE (ANM/USPS-3)**

The Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to the United States Postal Service. These questions relate to the service lives of Postal Service mail processing equipment and motor vehicles. See 2 Tr. 468-71, 481-86 (Tayman).

Respectfully submitted,



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April 13, 2000

QUESTIONS

ANM/USPS-3. For each vintage of each type of (1) motor vehicle and (2) mail processing equipment or related equipment that the Postal Service has used in any year since Fiscal Year 1998, please produce:

(a) All "fixed asset records" with information on that vintage and type of equipment (see, e.g., 2 Tr. 469-71).

(b) Any other accounting records needed to determine the "date of purchase, the cost, annual depreciation, accumulated depreciation, et cetera" for that type of equipment (see 2 Tr. 468-69 (Tayman)).

(c) Any other accounting records needed to determine the year-by-year retirements of that vintage and type of equipment (see 2 Tr. 469 (Tayman)).

(d) Any other accounting records needed to determine "the actual service life of any vintage of equipment by type" (see 2 Tr. 469).

(e) Any other accounting records needed to determine a survivor curve for each vintage of each type of equipment, based on actual retirements since the equipment first entered service.

(f) Any other accounting records needed to "know how long these assets actually last in service" (see 2 Tr. 468).

(g) Any other accounting records that provide a "reality check on the assumed asset lives" (see *id.*).

(f) All "USPS records on use of same or similar assets" (see Response of USPS witness Tayman to ANM/USPS-T9-7f (third bullet) (reproduced at 2 Tr. 120)).

INSTRUCTIONS

1. In answering these questions, please treat each line item in USPS-LR-I-224, *Personal Property and Motor Vehicle Asset Life Listing Provided in Response to ANM/USPS-T9-35*, as a separate "type of equipment." To the extent that the Postal Service's records permit, please also provide separate responses for the FSM 1000, the FSM 1000 (Phase II), the FSM 775, the FSM 881, the AFMSM 100, and any other model of flat processing equipment, and any component of those models for which separate retirement records have been maintained.

2. If the Postal Service has compilations, aggregations or summaries of any of the requested data, please provide those documents as well.

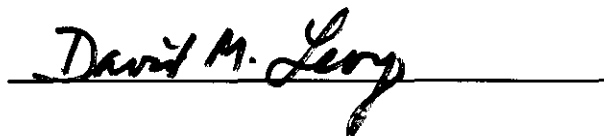
3. If a requested document is maintained in both hard copy and machine readable form, please produce the document in both forms.

4. If a machine readable document is maintained a PC-readable file format, please produce the machine readable document in that format.

5. Please identify the computer programs needed to use each machine readable document.

CERTIFICATE OF SERVICE

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

A handwritten signature in cursive script, reading "David M. Levy", is written over a horizontal line.

April 13, 2000