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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(PostCom/USPS-T-10-12-13)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-10-12-13. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Ian D. Volner
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Counsel for Association for Postal Commerce

PostCom/USPS-T-10-12. Please refer to your response to Postcom/USPS-T10-11, where you state, "a breakout of clerk hours by level is not available."

(a) Please provide the number of PS-4 clerks that currently work for the Postal Service. If not available, please provide the number of PS-4 clerks that worked at the Postal Service for the most recent time period where data are available.

(b) Please provide the number of PS-5 clerks that currently work for the Postal Service. If not available, please provide the number of PS-5 clerks that worked at the Postal Service for the most recent time period where data are available.

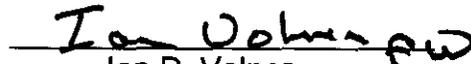
(c) Please provide the number of PS-6 clerks that currently work for the Postal Service. If not available, please provide the number of PS-6 clerks that worked at the Postal Service for the most recent time period where data are available.

Postcom/USPS-T10-13. Please refer to your response to Postcom/USPS-T10-11, where you state, "Although a clerk-casual can theoretically be assigned to any job that a PS-04 can do, the tenure limitations on a casual may make it uneconomical to give a casual the training a clerk might receive."

(a) Do casuals perform any activities that PS-4s are not qualified to do, but PS-5s and PS-6s are qualified to do. If so, please provide a list of all such activities.

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