

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  
TO INTERROGATORY OF THE ALLIANCE OF NONPROFIT MAILERS  
(ANM/USPS-3)

The United States Postal Service hereby provides its response to the following interrogatory of the Alliance of Nonprofit Mailers: ANM/USPS-3, filed on April 13, 2000.

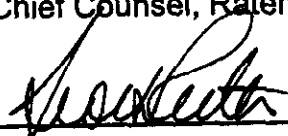
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Scott L. Reiter

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April 20, 2000

**ALLIANCE OF NONPROFIT MAILERS INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE**

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. 469-69 (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.).
- (h) 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)).

**RESPONSE:**

1. (a) – (h) Library Reference I-308, Material Provided in Response to ANM/USPS-3, Motor Vehicle Reports, provides the requested information. This Library Reference provides the following four attachments. Please note

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**RESPONSE: continued**

that information of dispositions was only available from Fiscal Year 1995 forward.

Attachment I – Summary listing of vehicles on hand as of AP 7, FY 2000 by Fiscal Year of acquisition.

Attachment II – Summary listing of vehicles on hand as of AP 7, FY 2000 by make and model.

Attachment III – Summary listing of disposed vehicles as of AP 7, FY 2000 by fiscal year of disposal.

Attachment IV – Summary listing of disposed vehicles as of AP 7, FY 2000 by fiscal year of disposal and make and model.

2. (a) – (h) Library Reference I-309, Material Provided in Response to ANM/USPS-3, Personal Property Reports, provides the requested information in four separate listings. These are:

- “Summary Listing of Personal Property on Hand as of the End of FY 1999 by Year of Acquisition” (pages 1 – 145).
- “Summary Listing of Personal Property on Hand as of the End of FY 1999 by Property Code Number” (pages 1 – 180).
- “Listing of All “G” Activity Disposals in FY 1997 - 1999 Summary Totals by Property Code Number (PCN), Year of Acquisition (YR ACQ)” (pages 1 - 76).

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**RESPONSE: continued**

- "Listing of All "G" Activity Disposals in FY 1997 -1999 Summary Totals by Year of Acquisition (YR ACQ), Property Code Number (PCN)" (pages 1 - 64).

## 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.



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Scott L. Reiter

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April 20, 2000