

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 TAYMAN TO INTERROGATORIES OF
THE ASSOCIATION OF PRIORITY MAIL USERS, INC.
(APMU/USPS-T9-6(c), 8, 24(a), 25, 26(c) &(d))

The United States Postal Service hereby provides the responses of witness Tayman to the following interrogatories of the Association of Priority Mail Users, Inc.: APMU/USPS-T9-6(c), 8, 24(a), 25, 26(c) &(d). The Postal Service had objected to these questions were filed on April 3, and APMU filed a motion to compel on April 12. The Postal Service decided to reply to the questions.

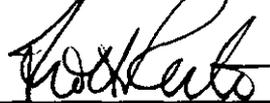
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



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April 28, 2000

**RESPONSE OF WITNESS TAYMAN TO INTERROGATORIES OF
ASSOCIATION OF PRIORITY MAIL USERS, INC.**

APMU/USPS-T-9-6.

For fiscal year 1998, please provide,

- c. The total number of Postal Service annuitants categorized by year of separation from the Postal Service (i.e., the number who left in 1998, 1997, 1996 and so forth); and

RESPONSE:

The Postal Service does not have this information for the FY 98 COLA billing.

The number of Postal CSRS annuitants in the FY 99 billing, broken out by the year of separation from the Postal Service, is reflected in the table below.

Please note that the FY 99 COLA billing includes annuitants as of the previous calendar year.

FY	Annuitants								
99	1,285	92	14,078	85	16,914	78	10,436	72	3,317
98	12,033	91	16,509	84	16,073	77	10,019		
97	11,694	90	18,148	83	13,340	76	2,412		
96	9,768	89	18,549	82	10,694	TQ	7,346		
95	7,973	88	17,471	81	14,048	75	5,390		
94	5,145	87	16,959	80	13,819	74	5,652		
93	41,918	86	16,835	79	11,487	73	12,040		

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APMU/USPS-T-9-8. Please provide the number of current CSRS-covered employees who were employed by the Postal Service in each of the years 1972 through 1998.

RESPONSE:

The Postal Service does not have the specific information requested. However, the following is provided as a substitute. The number of current Postal Service CSRS employees with service computation dates in each year (and the years prior to it) is reflected in the table below. Service computation date reflects all time employed by the Postal Service, service with other Government Agencies, and military service.

FY	# of Employees	FY	# of Employees	FY	# of Employees	FY	# of Employees
Prior	95,125	79	225,484	87	282,678	95	283,227
72	105,630	80	243,756	88	282,809	96	283,268
73	124,629	81	258,846	89	282,892	97	283,314
74	139,522	82	267,931	90	282,950	98	283,375
75	152,644	83	281,633	91	282,990	99	283,414
76	167,269	84	282,165	92	283,023		
77	184,788	85	282,362	93	283,120		
78	205,121	86	282,526	94	283,188		

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APMU/USPS-T-9-24.

Table 1998 in worksheet liability in workbook CSRS_00.xls in Postal Service Library Reference I-127 lists expense payments for CSRS unfunded retirement liability, that were set in the years 1972 through 1997. Please provide documentation in the form of that contained in CSRS_00.xls in USPS-LR-I-127 that describes how the deferred CSRS liability expense was set in the years 1972 through 1997.

RESPONSE:

- a. Please see the responses to APMU/USPS-T-9-9c-e. The basic methodology has been the same since the mid 1970's.

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APMU/USPS T-9-25.

Section 5 of Worksheet "Input" of workbook ACOLA_00.xls in LR-I-127 lists the number of CSRS retired annuitants in the base year 1998. How many (a) men and (b) women were added to the role of CSRS annuitants in each of the years 1971 through 1998.

RESPONSE:

Section 5 of the Input workbook reflects the number of USPS employees covered by CSRS who retired in FY 98, not the number of annuitants. The Postal Service does not have the number of employees who retired for years prior to FY 80. The number of men and women covered by CSRS who retired each year during the period FY 80-98 is reflected in the table below.

Year	Male	Female	Year	Male	Female	Year	Male	Female
79			87	18,117	3,615	95	6,723	2,102
80	24,696	3,193	88	18,526	3,742	96	7,741	2,408
81	18,721	3,016	89	21,314	4,636	97	9,011	3,096
82	16,611	3,001	90	20,306	4,663	98	9,252	3,394
83	19,066	3,090	91	7,088	2,147			
84	20,962	3,163	92	38,722	13,211			
85	19,448	3,345	93	5,485	1,556			
86	19,294	3,680	94	4,775	1,489			

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APMU/USPS T-9-28. Section 10 of worksheet Input of workbook ACOLA_00.xls of LR-I-127 lists the number of annuitants and the total number of years of Post 1971 Civilian Service (USPS) for both "retired annuitants" and "survivor annuitants."

- c. Please provide an estimate of the average number of years of service for all retired annuitants and an estimate of the average number of years of service for all survivor annuitants for the cohort of retired and survivor annuitants in the years 1971 through 1997.
- d. Please provide an estimate of the average number of years of service for all retired annuitants and an estimate of the average number of years of service for all survivor annuitants for the new retired and survivor annuitants in the years 1971 through 1997.

RESPONSE:

c. The Postal Service does not have this information prior to the FY 95 COLA billing. The requested information from the FY's FY 95 98 billings is listed in the table below. These data reflect total average years of service, including military and other Government service. Additional data may be available from the Office of Personnel Management Requests for additional data should be made directly to the Office of Actuaries at 1900 E St. NW, Washington DC 20415. The telephone number is 202-606-0722.

	FY 95	FY 96	FY 97	FY98
Annuitants	28.37	28.36	28.37	28.41
Survivors	25.74	25.93	26.15	26.34

d. The Postal Service does not have this information. This data may be available from the Office of Personnel Management Requests for additional data should be made directly to the Office of Actuaries at 1900 E St. NW, Washington DC 20415. The telephone number is 202-606-0722.

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.

William P. Tayman

Dated: 4.28.2000

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.



Scott L. Reiter

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April 28, 2000