

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, 2001 :
:

Docket No. R2001-1

**AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF
PRESORT MAILERS JOINT INTERROGATORY TO UNITED STATES
POSTAL SERVICE WITNESS TAYMAN (ABA&NAPM/USPS-T6-1)
(December 10, 2001)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit this joint interrogatory. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a

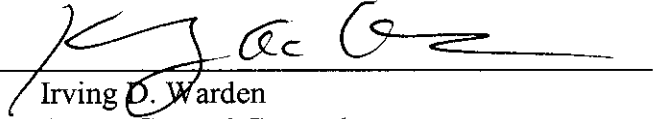
primary source and developed that data to achieve his final results." Docket No. R83-1,
Tr. 10/2795-96.

ABA&NAPM/USPS-T6-1 – In your response to OCA/USPS-T6-32, you state that,
“There have been no TFP calculations made beyond FY 2002.” Does this mean that the
test year calculations were made with the assumption that Postal Service productivity will
not increase in 2003?

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT
MAILERS

By: _____


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December 10, 2001
Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all
participants of record in this proceeding in accordance with Section 12 of the Rules of
Practice.


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