

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

Postal Rate and Fee Changes, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS TAYMAN TO
INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-T9-1)
AND MOTION FOR LATE ACCEPTANCE THEREOF

The United States Postal Service hereby provides the response of witness Tayman to the following interrogatory of American Postal Workers Union, AFL-CIO: APWU/USPS-T9-1, filed on August 29, 1997. The interrogatory is stated verbatim and is followed by the response.

The Postal Service moves that this answer be accepted one day late, due to an oversight. A copy of this document was faxed this morning to counsel for the APWU.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L Reiter

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September 15, 1997

RESPONSE OF WITNESS TAYMAN TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS' UNION, AFL-CIO

APWU/USPS-T9-1. In your library reference (LR H-12) you have a worksheet with the name SPTDC-97 XLS which has a section titled "SVCWIDE PERS OTHER PROGRAMS" In it there is an estimated increase in clerk and mailhandler workyears of 20,000 in 1997 and 30,000 in 1998. The increase is attributed to "equipment slippage"

- (a) Please explain what the term "equipment slippage" means.
- (b) Please provide all workpapers that show how the estimated increase in clerk and mailhandler workyears was derived.

RESPONSE:

a.&b. Please note that the 20,000 and 30,000 amounts to which you have referred are expressed in thousands of dollars not workyears. The number of workyears associated with these dollars, which can be found on the same worksheet, are 456 and 668, respectively. For an explanation of equipment slippage and the basis for the estimate please see page 31 of LR H-10

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: 9/12/97

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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