

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
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**AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF
PRESORT MAILERS FIRST SET OF JOINT INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS FOR USPS WITNESS
MAURA ROBINSON (USPS-T29-1-34)
(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 these joint interrogatories and requests for production of documents. 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-T29-1 - Please confirm that the Postal Service's proposed rate increases for FCM workshared letters are as follows:

Basic automation:

| | | |
|----------------------|------------|-----|
| Mixed AADC letters | +2.9 cents | 10% |
| AADC letters | +2.1 cents | 8% |
| Auto 3-digit letters | +2.5 cents | 9% |
| Auto 5-digit letters | +2.5 cents | 10% |
| Auto carrier route | +3 cents | 12% |

ABA&NAPM/USPS-T29-2

- a. In your testimony, you state that the proposed discounts exceed the cost avoidance measured by USPS witness Miller in this case. Is this the only rate case in which the Postal Service has proposed discounts in excess of calculated avoided costs? Please cite all past cases if your answer is in the negative.
- b. Why have you proposed discounts in excess of Postal Service measured cost avoidance in this case? Is it in part because your rate increases are so large, you fear a disruption of mail volume if the discounts are not increased?

ABA&NAPM/USPS-T29-3 - On page 10, lines 1-6, of your testimony, you state that discounts should be set and are set so that there is an incentive for entry by the private sector into mail processing only if they can do the work more cheaply than the Postal Service. Assume as a hypothetical that the fully loaded direct labor cost structure of mail processing labor for the Postal Service is \$30.44/hr before premium pay adjustments, and assume that the corresponding labor cost for mail processing labor in the private sector is \$12.00/hr. Further, assume that capital costs (buildings and equipment) are identical, and that there are no other mail processing costs.

- a. Under such circumstances, should the Postal Service be in the letter mail processing business for FCM at all?
- b. If the circumstances were reversed, would the private sector be in the mail processing business at all?
- c. If mail processing were a fully separable activity with its own market price, instead of a discount from an integrated activities Postal Service as at present, would the USPS be in the mail processing business under the above cost structure?

- d. Were it not for access to the Postal Service's monopoly universal delivery system, do you believe presort bureaus and major mailers would continue to do business with the USPS given the current structure of discounts?

ABA&NAPM/USPS-T29-4 - Assume the cost structure set forth above in ABA&NAPM/USPS-T29-3. Suppose worksharing discounts were set not to the levels of the avoided costs of the Postal Service, but to the larger social gains from the private sector performing that work.

- a. Please confirm that from a resource allocation standpoint, such discounts would be superior on efficiency grounds than the way discounts are currently set, namely to the avoided costs of the Postal Service.
- b. Please confirm that the loss to the Postal Service would be less than the social welfare gains to consumers under such a reallocation of resources.

ABA&NAPM/USPS-T29-5 - Please confirm that without your added discount of 0.5 cents for FCM workshared letters, every rate increase proposed in this case for workshared letters would be three cents or more except for AADC letters.

ABA&NAPM/USPS-T29-6 - On page 5, lines 20-22, you assert the Postal Service's goal of increasing the automation compatibility of letter shaped FCM has been accomplished through the design of the rate structure. Witness Miller emphasizes that those cost reduction efforts have been targeted largely toward the non-prebarcoded single piece mailstream (USPS-T-22, revised, p. 4, lines 3-14). Please explain how the rate design for single piece mail has caused an increase in automation compatibility.

ABA&NAPM/USPS-T29-7

- a. Do you agree that in the history of worksharing discounts for FCM letters, there have been (at least) three distinct philosophies for what constitutes the benchmark you refer to starting at page 9, line 15 of your testimony? Namely, the Commission's "Appendix F" method based on cost differences between actual mailstreams, single piece and presort; the Postal Service's "identical piece" method based on comparisons between a hypothetical construct and an actual piece of mail, a mailpiece identical in every respect to a presort letter except for the presort versus a presorted letter; and finally the "most likely conversion" method based on comparisons between bulk and metered mail and prebarcoded/presorted letters.

- b. Would you agree that the Commission's Appendix F methodology generally provided a basis for larger discounts than the Postal Service's identical piece methodology?
- c. Would you agree that the Commission's 100% volume variability methodology generally provides a basis for larger discounts than the Postal Service's less-than-100% volume variability methodology, albeit using the same benchmark?
- d. Please see the Postal Service response to interrogatory ABA & NAPM/USPS-T22-4 where the Postal Service calculated cost avoidance for automated FCLM mixed AADC (7.835 cents), AADC (8.918 cents), 3-Digit (9.280 cents) and 5-Digit ((10.552 cents), using the PRC methodology of R2000-1, including the use of non-automated presort as proxy for bulk metered mail to calculate delivery costs. Compare these cost avoidance findings to those found by the Commission in R2000-1 using this methodology [(see page 243 of PRC Rec. Dec. and Op. in R2000-1: automated FCLM Basic (6.2 cents), 3-Digit (7.3 cents) and 5-Digit (8.7 cents)]. Please confirm that under this apples-to-apples comparison, automated FCLM workshare savings have increased from R2000-1 to R2001-1. Please confirm that the above-listed PRC version-derived cost avoidance figures for R2001-1 exceed the discounts which you have proposed for automated FCLM mixed AADC, AADC, 3-Digit and 5-Digit.
- e. When the limits of converting further mail to worksharing are approached in FCM, as they may be now, does it make any sense to use as a benchmark for setting discounts a philosophy which has as its rationale that it comes closest to being candidate mail for further conversion? Wouldn't it make more sense, to set discounts which would grow the volume of that mailstream directly, rather than through conversion mail?

ABA&NAPM/USPS-T29-8

- a. If FCM workshared letter mail were a distinct subclass within FCM, please confirm it would make no sense to have a BMM or any other benchmark for setting workshared rates.
- b. If the situation posited in a. were true, please confirm that it would not hinder any further conversion of candidate-worksharing mail from converting.
- c. Please confirm if the situation posited in b. were true, it might further encourage conversion to worksharing if true cost based (i.e., bottom-up) rates were lower than discount based (i.e., top-down) rates.

ABA&NAPM/USPS-T29-9 - On page 11, lines 11-12 of your testimony, what do you mean by the phrase “reduced overall operating costs for mailers”? Do you mean USPS is responsible for the operating costs of private sector mail processing operations and changes therein? Do you mean that rates paid by major mailers in FCM have gone down since the advent of the automation era in mail processing?

ABA&NAPM/USPS-T29-10 - On page 12, line 5, of your testimony you refer to the high implicit cost coverage of FCM workshared letter mail of 281.6% in the base year (2000) for this case.

- a. Do you understand this to be a mark-up above variable costs?
- b. Is it your belief that this high mark-up indicates the impact of the private express statutes, namely the statutory monopoly, on FCM workshared rates? Please explain your answer completely.
- c. Where monopolists in the private sector engage in technological innovation which lower variable costs, do they tend to capture the value of the innovation in greater profitability as a result of their monopoly power? Cite empirical evidence in support of your answer.

ABA&NAPM/USPS-T29-11 - Regarding your discussion on page 13, lines 1-7 please answer the following questions.

- a. What do you mean by the long-term? One year?
- b. Is this discussion simply code word language for the expected reclassification case the USPS will likely file after this case, in which subclass status for FCM workshared mail will be proposed?
- c. With regard to your statement that avoided costs appear to decline, reconcile this statement with your response to ABA & NAPM/USPS-T29-(7)(d) above.
- d. Is it your position that not disrupting the current rate structure for FCM workshared letters is more important than retaining the concept of avoided costs and discounts, if as you suggest, the two goals appear to be increasingly contradictory?
- e. Doesn't the situation referenced in c. indicate that the concept of avoided costs is perhaps an entirely obsolete basis for rate setting for FCM workshared mail?

ABA&NAPM/USPS-T29-12 - On page 14, lines 10-12 of your testimony, you claim any smaller increase in the first ounce rate for single piece FCM letters would impose unreasonably large increases on other classes of mail.

- a. Are you aware that before advertising mail became a large business for the Postal Service, FCM shouldered almost the entire cost burden of the universal delivery mandate?
- b. Are you aware that when advertising mail first became priced within postal services, it was priced at its marginal cost, with very little or no reference to covering any portion of the delivery costs of the Postal Service?
- c. Please state what your understanding is of the allocation, currently, of total delivery costs (not so-called volume variable costs and not so called “attributable” costs) across the major mail subclasses.

ABA&NAPM/USPS-T29-13 - On page 14 of your testimony at line 14, you talk about a mail class’s “fair share of the institutional cost burden”.

- a. What is FCM’s share per mail piece and per ounce of the total delivery costs that are defined to be “institutional”?
- b. What is Standard A mail’s share per mail piece and per ounce of the same large slice of institutional costs that are delivery costs?
- c. What is periodical mail’s share of those delivery costs per mail piece and per ounce?

ABA&NAPM/USPS-T29-14 - On page 14, lines 14-17, you suggest that the general public could not handle a single piece first ounce FCLM rate in other than whole cents.

- a. Cite all studies or other information you relied on in rendering this opinion.
- b. Do you think the general public would mind buying even numbers of say a 36.5 cent stamp at a time if they could save a penny for every two stamps?

ABA/NAPM-T29-15

- a. In your testimony on pages 4-5 you have reported that from 1991 to 2000 the FCM volume and revenue grew by an annual rate of 1.5% and 2.9%, respectively. Please confirm that the corresponding numbers for Standard mail are 3.7% and 5.4%.

- b. Please confirm that for FCM the ratio of revenue growth to volume growth is 1.93 (2.9%/1.5%) and for Standard Mail it is 1.45 (5.4%/3.7%).
- c. Please explain why FCM's contribution to USPS revenue growth relative to its volume should be 33% $[(1.93/1.45)\%]$ higher than Standard Mail's despite the fact that Standard Mail's volume has been growing more than twice as much as FCM's.
- d. Did you take into account this important fact in your rates design and cost coverages as a matter of "fairness" to FCM? If not, please explain why not. If yes, then explain how.
- e. Do you know of any other USPS witness(s) who might have considered this matter? If so, please identify them.

ABA/NAPM-T29-16

Please refer to pages 7-9 of your testimony regarding the methodology you chose to forecast the additional ounce volume. You discuss two methods (Method 1 and Method 2) that you considered. However, you state that in evaluating them you found that Method 1 underestimates while Method 2 overestimates the additional ounce volume. Thus, "...due to the short time available to prepare the Postal Service's proposal for this case..." and "Faced with the choice between two imperfect methods,..." you decided to choose Method 1 with an adjustment of 1% to correct for underestimation.

- a. On what basis did you choose 1% adjustment? Why didn't you choose 2% or 3%? If you conducted any analyses in order to arrive at the 1% number, please provide those analyses. Otherwise, please state if it was based on your personal experience or hunch.
- b. If one method underestimates whereas the other method overestimates the forecast, why didn't you consider the average of the two? Wouldn't that have been easier and less controversial?
- c. If you had chosen the average of the two methods, what would have been the forecast for the additional ounce volume? How would have this affected the amount of revenue USPS would have generated due to this forecast?

ABA/NAPM-T29-17

Please refer to page 10 of your testimony. You state that "Benchmarked cost avoidances provide important data on the Postal Service's avoided costs; however, they do not necessarily form a complete picture of the Postal Service's cost structure."

- a. Please provide in detail the “complete picture of the Postal Service’s cost structure” pertinent to benchmarked cost avoidance.
- b. How would the knowledge of “complete picture of the Postal Service’s cost structure” affect the calculations of cost avoidances?

ABA/NAPM-T29-18

Please refer to pages 11-12 of your testimony. You state “Witness Miller’s cost avoidance estimates... are designed to capture the costs of avoided Postal Service operations and his estimates may not reflect factors such as mail characteristics or additional activities that the Postal Service does not perform (and thus cannot be “avoided), but which do provide a benefit to the Postal Service.”

- a. Please describe in detail all those characteristics or additional activities that provide benefit to the Postal Service. Please be specific as to the nature of those activities.
- b. Please provide some dollar estimates of those benefits. If such estimates do not exist, please explain why USPS has not yet estimated the dollar values of such benefits which can be useful in rates design.

ABA/NAPM-T29-19

- a. Please confirm that you have presented the following pass through values for FCM at page 20 of your testimony:

| | |
|------------|------|
| Mixed AADC | 119% |
| AADC | 115% |
| 3-Digit | 121% |
| 5-Digit | 121% |

- b. Please confirm that the Postal Service is proposing the following pass through values for Standard Mail, and if you do not confirm, please provide the correct pass through values as well as the unit cost savings and proposed discounts:

| | |
|------------|------|
| Mixed AADC | 194% |
| AADC | 169% |
| 3-Digit | 142% |
| 5-Digit | 139% |

- c. Explain in detail and provide any studies or analyses conducted to justify the reasons the pass through values (proposed discounts relative to work-sharing

related savings) for Standard Mail are substantially larger than those for First-Class Mail.

ABA&NAPM/USPS-T20 - In response to MMA/USPS-T29-2.c. and again at your response to MMA/USPS-T29-4.b., you state that your ½ cent increase discount proposal balances the issue of pass-throughs of cost avoidance with the issue of implicit cost coverage creep within FCM workshared letters.

- a. Please quantify why that balance would be achieved at just a 0.5 cent increase, as opposed to a 0.6, 0.7, 0.8, 0.9 and 1.0 cent increase.
- b. In fact, isn't your apparent "balance" made possible by the fact that you are raising all rates for the FCM letters subclass by 3 cents, which then makes it possible for a larger giveback of ½ cent (or more)?

ABA&NAPM/USPS-T21 - In response to MMA/USPS-T29-3.c. you show the recent history of a single rate category (FCM workshared letters, 5D), but date the comparison from R94-1. Please provide the information for all workshared letter rate categories, FCM and Standard A, using MC95-1 as the benchmark start date and R2000-1 (7/1/01) as the end date.

ABA&NAPM/USPS-T22 - In response to MMA/USPS-T29-4.a., you state "I was also reluctant to increase the discounts further given the lack of data on the reasons underlying the high implicit cost coverages observed for workshare mail."

- a. Please confirm that in past rate cases through R2000-1, USPS rate design (and other) witnesses have alleged that the sole reason for these high and growing "implicit" cost coverages for FCM workshared are the reduced costs of mail processing from more highly prepared mail entering the system. (See, e.g. R2000-1, USPS-T32, page 10, lines 1-14, witness Mayes, discussing the cost criteria of section 3622.b.)
- b. Please confirm that in this case, USPS rate design witness Moeller (USPS-T28) does not raise the issue raised by witness Mayes in a. above in his discussion of section 3622.b. cost criteria.
- c. In light of your answers to a. and b. above, has the Postal Service recanted its previous position in favor of this view that cost coverage creep is an issue whose causes need to be studied?
- d. Do they need to be studied before any contemplated reclassification of FCM letters subclass?

- e. Are any studies of this issue now underway, or contemplated?
- f. Please confirm that in a private market, if costs for a product or service go down, but prices do not, or do not in the same proportion, then profits go up.
- g. Please confirm that in a private market, if costs go down but prices do not, that is an indication of a degree of market power possessed by the seller in such a market.

ABA&NAPM/USPS-T23 - In response to MMA/USPS-T29-4.d. you state that “I am not recommending an implicit cost coverage for First Class Mail workshared letters.” Yet, in response to MMA/USPS-T29-4.c. you state “I chose to mitigate the impact on automation rates by increasing discounts by 0.5 cents.”

- a. Please confirm that your choice on discounts leads to a set of rates for workshared letters within the overall FCM rate design for the letters subclass.
- b. Please confirm that “implicit” cost coverages for workshared letters within the FCM letters subclass are determined once workshared letter rates are set.
- c. Please confirm that in your rate design proposal for FCM letters, you were aware at all stages of the process what impact your discount and rate options for FCM workshared letters would have on implicit cost coverages for workshared letters, either from your own calculations or in discussion with other USPS witnesses and analysts.
- d. If your answer to c. is other than an unqualified confirmed, please explain why you would not have considered cost coverage implications from the different rates and discounts you contemplated.
- e. Please confirm that had you “chosen” a different increase for discounts than ½ cent, the implicit cost coverage would have been different than the TY2003 after rates 294.1% that necessarily follows from your discounts choice.
- f. When you say “I chose to mitigate,” is it not also true that you had the free will, for example, to say “I chose to mitigate the impact on automation rates by increasing discounts by 0.6 cents.” If the answer is anything other than an unqualified “Yes”, please explain in complete detail why you “chose” 0.5 cents and not 0.6 cents.
- g. Please confirm that the two factors you “balanced” in arriving at your discounts for FCM workshared letters, namely cost avoidance, and cost coverage creep, are both exact, quantified magnitudes, i.e. numbers, and that your discount increase choice is also an exact number, namely 0.5 cents.

- h. If your choice of an increase in discounts was not in fact somewhat arbitrary, as many of your comments would appear to suggest, please explain fully why your “choice” of a 0.5 cent increase in discounts was not arbitrary.[E. G., please state exactly the mathematical relationship you used in balancing these two factors to arrive at a 0.5 cent increase in discounts. (I. E., the weight you assigned each of your two stated considerations)].
- i. If you did not use a mathematical relationship, please state to what degree your own choice for increasing discounts was subjective or intuitive?

ABA&NAPM/USPS-T24 - On page 13, lines 3-4, of your testimony you state that “[as] efforts to encourage worksharing are successful, avoided costs appear to decline.”

- a. Are you asserting cause and effect? If so please fully explain.
- b. Are you asserting statistical correlation? If so please provide any data you have.
- c. Would you agree that the Postal Service’s labor agreements with clerks might give it an incentive to produce cost studies showing a reduction in avoided costs in an effort to keep work in house?
- d. Would you agree that the Postal Service has an inherent conflict between encouraging work sharing on the one hand, and providing job security to mail processing clerks on the other?
- e. Are you aware of the term “labor refugees” introduced by witness Halstein Stralberg in prior rate cases in reference to the impact of automation on the need for mail processing clerks?
- f. In your view, would keeping more of the mail processing work in house for FCM workshared letter mail result in a higher dollar value contribution to USPS institutional costs and fewer attributable costs and higher cost coverages for Automated FCLM than would greater outsourcing? Or would the contribution levels be about the same dollar wise? Please provide all necessary calculations needed to answer the question.

ABA&NAPM/USPS-T25 - In your response to MMA/USPS-T29-6, you refer to your response to MMA/USPS-T22-1.f. and g. The response to these questions in the record, dated November 5th, are by witness Miller and do not appear to have anything to do with MMA/USPS-T29-6. Please clarify.

ABA&NAPM/USPS-T26 - In response to MMA/USPS-T29-5, you speak of “low relative First Class mail rate increases since the mid-1990s”.

- a. Is the rate increase for FCM in this rate increase, therefore, large, namely 3 cents compared to the 1 cent increase in R2000-1?
- b. Would you agree that relatively, Standard A mail rates have been kept even lower than FCM mail rates?
- c. If your answer to b. is in the affirmative, please explain why since the same mailer preparation activities apply to both classes.

ABA&NAPM/USPS-T27 - In your table accompanying your response to MMA/USPS-T29-6, please confirm that one reason the Postal Service's measure of avoided costs has gone down across three rate cases is that USPS witnesses have used different methodologies in each case showing, *ceteris paribus*, more narrowly measured cost avoidance as a direct result of the changed methodology.

ABA&NAPM/USPS-T28 - You propose an expanded definition of the single piece nonstandard surcharge in your testimony.

- a. Is this a precursor to reclassification of the letters subclass of FCM?
- b. Please confirm that projected volumes of FCM workshared letters are now or shortly will exceed those of single piece letters.
- c. Would the change in b. be a legitimate reason for redefining the FCM letters subclass?
- d. Under such a hypothetical reclassification, would there be a surcharge for FCM collection mail? For facing and canceling?

ABA&NAPM/USPS-T29- In response to MMA/USPS-T29-11.b., you state the issue of advertising included with FCM letters being priced higher than advertising included in Standard A letters "does not present a "problem."" You so state, arguing it gives mailers additional choices and that there are other cost factors involved for the mailers in making such a choice.

- a. In fact, is not the example MMA presents an overt case of price discrimination as defined in various antitrust statutes?
- b. Is it not a fact that the other cost factors you mention are precisely what enables the Postal service to so price discriminate, i.e. except for those higher mailer costs to prepare two pieces of mail rather than one, they would always choose the

Standard A rate option for the ad mail given the two tiers in pricing noted in the MMA interrogatory?

ABA&NAPM/USPS-T30 - In response to MMA/USPS-T29-12 you state that “marginal cost estimates by ounce increment are problematic”.

- a. Which weight cell increments are problematic?
- b. How can lumping problematic weight cells into an overall group create an accurate measure of extra ounce costs?

ABA&NAPM/USPS-T31 - In response to GCA/USPS-T29-18, you state that “some mailers have expended resources to participate in the workshare program.”

- a. Please confirm that all mailers who participate in the workshare program expend resources, i.e. have capital costs for automation equipment, labor costs, management costs, etc.
- b. If your answer to a. is other than an unqualified “Yes.”, please explain how any worksharing mailer could participate in the program without “expended resources”.

ABA&NAPM/USPS-T32 - In response to GCA/USPS-T29-9, you appear to imply that the Postal Service is no longer setting FCM worksharing letters discounts to encourage greater volume of such letters in order to drive costs out of the Service.

- a. Does your answer imply that there has been a fundamental shift in the philosophy?
- b. Is the USPS counting on processing all or nearly all remaining non-automation mail on its own systems?
- c. If your answer to b. is anything other than an unqualified “No.”, please explain what sense or legitimacy a metered mail benchmark has for setting worksharing discounts, if in fact this is no longer considered candidate mail for conversion to worksharing if the USPS is going to process this mail in house.

ABA&NAPM/USPS-T33 - Suppose there were no further candidate mail for conversion to worksharing (i.e. the primary volume growth driver), as your answer to GCA/USPS-T29-9 seems to imply.

- a. How would the USPS set discounts for FCM worksharing letters?
- b. What factors would be used to define a benchmark and why?

- c. Would such a situation increase the likelihood that subclass status would be warranted for such workshared letter mail?

ABA&NAPM/USPS-T34 - Please refer to the response to OCA/USPS-80. In this response, you make clear that priority mail is given preference over FCM in delivery standards, a value of service issue, namely 2 versus 3 day delivery service standards for three-digit ZIP code pairs. However, whenever the debate arises over FCM rates and cost coverages compared to Standard A mail rates and cost coverages, the Postal Service always argues that FCM is given top priority. Since this is clearly not the case, how can you maintain within the appropriate 3622.b. criteria the discrepancy between FCM and Standard A rates?

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
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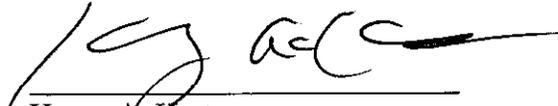
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CERTIFICATE OF SERVICE

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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