

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
DOUGLAS F. CARLSON
(DFC/USPS-T10-1-10)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Douglas F. Carlson: DFC/USPS-T10-1-10, filed on February 7, 2000.

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, Ratemaking



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February 22, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T10-1. Please refer to your testimony at page 2, lines 24-26.

- a. Please confirm that P&DC managers prefer to receive collection mail from stations, branches, AO's, and collection runs as early in the day as possible. If you do not confirm, please explain.
- b. Please explain and provide copies of all Postal Service policies that exist to set a target for a specific percentage of the day's collection mail to be received at the P&DC by a particular hour or cancelled by a particular hour.

Response:

- a. Confirm.
- b. As a rule, we like to have 50% of the collections cancelled by 1800. The amount of mail cancelled by 1800 is monitored on the Mail Condition Reporting System on a daily basis. There is no Management Instruction pertaining to this subject.

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DFC/USPS-T10-2. Please refer to your testimony at page 3, lines 22-24.

- a. Please explain why it is more efficient to send OCR-readable pieces to the OCR, rather than to have the AFCS lift the images and process the images through the RBCS system.
- b. Please confirm that some P&DCs regularly run their AFCS machines in the "lift everything" mode for a significant portion of their run time. If you do not confirm, please explain the basis for your understanding.
- c. Please explain why some P&DCs regularly run their AFCS machines in the "lift everything" mode for a significant portion of their run time given that this mode is, according to your testimony, less efficient than directing OCR-readable mail to OCRs for processing.
- d. Does your use of "currently" in line 23 suggest that the relative efficiencies may change in the near future? Please explain.

Response:

- a. Images processed through the OCR/ISS and RCR have a higher encode rate than pieces lifted on the AFCS/ISS with just the RCR. Therefore, fewer images must go to the REC to be keyed if the enriched mail is sent to the OCR/ISS for image lift. In addition, the pieces encoded on the OCR can be sorted and finalized without delay. The images lifted from the AFCS/ISS that are resolved by the RCR must still wait until the unresolved images are keyed before being run on the BCS/OSS for barcode application and sortation.
- b. Do not confirm. I do not have data to support the assertion. The policy is to operate the AFCS/ISS in the script only mode unless there are unusual circumstances at the local level, as mentioned below. There are no reports

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that show what mode each AFCS/ISS across the country is set on or for how long.

- c. I have no data to support the assertion that "some P&DCs regularly run their AFCS machines in the "lift everything" mode for a significant portion of their run time." If a P&DC runs their AFCS machines in the "lift everything" mode it is a local decision based on their complement of equipment, capacity concerns, and operating plan commitments. For example, if a plant receives an unusually large quantity of OCR candidate metered mail, a decision could be made to switch to "lift everything" mode to ensure clearance times are met for the outgoing operations.
- d. Yes. An OCR may be added to the AFCS in the future and RCR encode rates will continue to improve.

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DFC/USPS-T10-3. Please refer to your testimony at page 3, lines 28-29 and page 4, lines 1-3.

- a. Please provide the locations of the seven remaining LSMs and specify whether each LSM is an MPLSM or an SPLSM.
- b. Please explain why the facilities that use these LSMs still use them while most other facilities no longer use LSMs.
- c. Has use of manual sorting instead of MPLSM sorting proven to reduce Postal Service costs for mail that the automation is unable to process? Please explain.
- d. Regarding your statement that removal of letter mechanization equipment has improved service, please explain why manual processing of automation reject mail provides better service than LSM processing.
- e. Please confirm that LSM processing was faster than manual processing and that automation reject mail receives, on the whole, slower delivery service than this mail received when it was processed on LSMs. If you do not confirm, please explain the basis for your answer.

Response:

- a. There are now five remaining MPLSMs. They are located at New Jersey BMC, Seattle AMC, St. Louis P&DC (currently being dismantled), and two at Los Angeles AMC. There are no SPLSMs.
- b. Seattle AMC and Los Angeles AMC use MPLSMs to sort international mail. New Jersey BMC occasionally uses MPLSM to sort broken bundles of Standard Mail (A).
- c. Given the small amount of non-automation letters, the mailflow is simplified by sending all the remaining volume to one operation. The volume left does not justify a MPLSM and its associated costs and space.

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- d. Mechanical missorts on the LSM were higher than manual processing missorts for the automation reject mail.
- e. LSM productivity was higher than manual productivity. Given that improved service trends followed the LSM removal trend and the service standards are the same regardless of processing method, I cannot confirm that manual processing is slower than LSM for automation rejects.

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DFC/USPS-T10-4. Please provide the locations of the 101 Low-Cost MLOCs.

Response:

See attached list.

DBCS/LCOCR SCHEDULE

A R E A	PLANT (MSF)	SITE NAME VERSION DATE 04/24/97 REV -07-	ST
	LCOCR	LCOCR	93
AL	SE PENNSYLVANIA P&DF	SE PENNSYLVANIA P&DF	PA
NE	F.A.T. - PHASE A	WATERTOWN	NY
WE	PHOENIX P&DC	PHOENIX P&DC	AZ
PA	REDDING	REDDING	CA
SE	PENSACOLA P&DC	PENSACOLA P&DC	FL
AL	WILLIAMSPORT P&DF	WILLIAMSPORT P&DF	PA
MA	HICKORY P&DF	HICKORY (LCOCR)	NC
GL	CHICAGO CENTRAL	CHICAGO CENTRAL	IL
MW	MILWAUKEE P&DC	MILWAUKEE P&DC	WI
SE	BIRMINGHAM P&DC	BIRMINGHAM P&DC	AL
AL	ALTOONA P&DF	ALTOONA P&DF	PA
DC	MARTINSBURG	WINCHESTER	VA
NY	SAN JUAN P&DC	SAN JUAN P&DC	PR
SW	TYLER P&DC	TYLER P&DC	TX
WE	PHOENIX P&DC	PHOENIX P&DC	AZ
WE	SEATTLE P&DC	SEATTLE P&DC	WA
GL	TERRA HAUTE	TERRA HAUTE	IN
MA	CHARLOTTESVILLE P&DF	CHARLOTTESVILLE	VA
MW	MINNEAPOLIS P&DC	MINNEAPOLIS	MN
NE	BROCKTON P&DC	BROCKTON P&DC	MA
PA	WORLDWAY AMF	WORLDWAY AMF	CA
WE	DENVER P&DC	DENVER P&DC	CO
AL	STEUBENVILLE CSF	STEUBENVILLE CSF	PA
MA	BRISTOL	BRISTOL	TN
NE	ALBANY	PLATTSBURGH	NY
NY	SAN JUAN P&DC	SAN JUAN P&DC	PR
PA	WORLDWAY AMF	WORLDWAY AMF	CA
SW	GREENVILLE P&DC	GREENVILLE P&DC	TX
AL	GREENSBURG MPC	GREENSBURG MPC	PA
AL	PITTSBURGH P&DC	WHEELING	WV
GL	BLOOMINGTON P.O.	BLOOMINGTON P.O.	IN
MA	BLUEFIELD P.O.	BLUEFIELD P.O.	WV
MW	RAPID CITY P&DF	RAPID CITY P&DF	SD
WE	ANCHORAGE P&DC	ANCHORAGE P&DC	AK
AL	ZANESVILLE	ZANESVILLE	OH
MA	BECKLEY	BECKLEY	WV
MW	MINOT	MINOT	ND
SE	SAVANAH P&DF	SAVANAH P&DF	GA
SW	GREENVILLE P&DC	GREENVILLE P&DC	TX
SW	WACO P&DF	WACO P&DF	TX
AL	JOHNSTOWNS P&DF	JOHNSTOWNS P&DF	PA
MW	IRON MOUNTAIN P&DF	IRON MOUNTAIN P&DF	MI
SW	ABILENE MPO	ABILENE MPO	TX
WE	BOISE	BOISE	ID
WE	EVERETT P&DF	EVERETT	WA
WE	PORTLAND P&DC	PORTLAND P&DC	OR
AL	WILMINGTON	WILMINGTON	DE
MW	GRAND FORKS	GRAND FORKS	ND
SW	FORT SMITH MPO	FORT SMITH MPO	AR
WE	CASPER	CASPER	WY
WE	MEDFORD	MEDFORD	OR
WE	YAKIMA	YAKIMA	WA
AL	SCRANTON P&DF	SCRANTON P&DF	PA
MW	QUINCY	QUINCY	IL
SW	ABILENE MPO	ABILENE MPO	TX
SW	ALEXADRIA MAIN OFFICE	ALEXADRIA MAIN OFFICE	LA
WE	GREAT FALLS	GREAT FALLS	MT
WE	POCATELLO	POCATELLO	ID
MW	HURON P&DF	HURON P&DF	SD
MW	MANKATO P&DF	MANKATO P&DF	MN
SW	BRYAN MPO	BRYAN	TX

DBCS/LCOCR SCHEDULE

RE

A R E A	PLANT (MSF)	SITE NAME VERSION DATE 04/24/97 REV -07-	ST
WE	WENATCHEE	WENATCHEE	WA
WE	MISSOULA	MISSOULA	MT
WE	PROVO	PROVO	UT
MW	QUINCY	QUINCY	IL
PA	MOJAVE	MOJAVE	CA
SE	ALBANY	ALBANY	GA
U/A	U/A	U/A	
WE	BUTTE	BUTTE	MT
WE	GRAND JUNCTION	GRAND JUNCTION	CO
AL	NEW CASTLE P&DF	NEW CASTLE P&DF	PA
MW	BISMARCK P&DF	BISMARCK P&DF	ND
PA	MOJAVE	MOJAVE	CA
SE	JOHNSON CITY	JOHNSON CITY	TN
SW	TEXARKANA MPO	TEXARKANA	TX
WE	ROCK SPRINGS	ROCK SPRINGS	WY
GL	CHICAGO CENTRAL	CHICAGO CENTRAL	IL
MW	LA CROSSE	LA CROSSE	WI
PA	EUREKA	EUREKA	CA
SW	BRYAN MPO	BRYAN	TX
WE	BEND P&DC	BEND P&DC	OR
	U/A	U/A	
AL	DUBOIS	DUBOIS	PA
GL	TERRA HAUTE	TERRA HAUTE	IN
MW	MADISON P&DC	MADISON P&DC	WI
SE	JACKSON CSF	JACKSON CSF	TN
SW	LUFKIN MPO	LUFKIN	TX
	U/A	U/A	
AL	WILKES BARRE P&DF	WILKES BARRE P&DF	PA
DC	BALTIMORE/FREDERICK	CUMBERLAND	MD
GL	GRAND RAPIDS ANNEX	GRAND RAPIDS ANNEX	MI
MW	ST. LOUIS P&DC	CARBONDALE	IL
SE	CHATTANOOGA P&DC	CHATTANOOGA P&DC	TN
	U/A	U/A	
AL	MANSFIELD GMF	MANSFIELD GMF	OH
MA	GREENSBORO P&DC	GREENSBORO	NC
NE	BRIDGEPORT P&DF	BRIDGEPORT P&DF	CT
NE	EASTERN MAINE P&DF	EASTERN MAINE P&DF	ME
SE	COLUMBUS	COLUMBUS	GA
SW	WICHITA FALLS MPO	WICHITA FALLS	TX
NE	BROCKTON P&DC	BROCKTON P&DC	MA
SW	JONESBORO MPO	JONESBORO	TX
AHQ	TRAINING	TRAINING	ECA
AHQ	TRAINING	TRAINING	ECA
AHQ	MSTC - Norman	MSTC - Norman	OK
		SSPK 502-23401-40	(Z)
		SSPK 502-23401-41	(A)
		SSPK 502-23401-42	(B)

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DFC/USPS-T10-5. Are any SLOCs still in service? If yes, please identify the locations.

Response: I have not been able to locate any SLOCs still in service.

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DFC/USPS-T10-6.

- a. Please provide a list showing the REC to which each P&DC, P&DF, or other processing facility sends its RBCS images.
- b. Please specify the expected closing date of the RECs that are scheduled to close and indicate the facility to which the client sites of those RECs will send their images after those RECs close.

Response:

- a. Please see the attached document "Remote Bar Coding System Area Configurations". It lists the 55 RECs prior to any consolidation and the plants supported by each REC.
- b. Please see the attached document titled "Master REC Closing Synopsis". It lists the closing RECs, the plants associated with those RECs, the gaining REC where plant support will be transferred, and the plant move dates which indicate when plant keying support will be reassigned to the gaining REC.

Remote Bar Coding System

RBCS

Area System Configurations

Allegheny Area

REC 3 Lehigh Valley PA REC:

Philadelphia PA

- 1 Lehigh Valley PA
 - Williamsport PA
- 1 Wilmington DE

REC 5 *Akron OH REC:

Cleveland OH

- 3 Akron OH
 - Wheeling WV
- 3 Reading PA
- 2 Toledo OH
- 2 Lancaster PA
- 1 Youngstown OH
 - Steubenville OH
- 1 Canton OH
 - Mansfield OH

REC 25 *Pittsburgh PA REC:

Pittsburgh PA

Cincinnati OH

Scranton PA

Wilkes-Barre PA

- 1 Erie PA
 - Johnstown PA
- 1 New Castle PA
 - Greensburg PA
 - Altoona PA

REC 35 *Dayton OH REC:

Columbus OH

- Chillicothe OH
- 1 Dayton OH
- 1 Lima OH
 - Zanesville OH

Harrisburg PA

South Jersey NJ

REC 48 York PA REC:

Southeastern PA

South Jersey NJ

- 1 Wilmington DE
- 1 Lancaster PA
- 1 Reading PA

Capital Metro

REC 2 Greensboro NC REC:

Baltimore MD

Washington DC

Frederick MD

- * Baltimore IMF

- * Easton Shore MD

REC 8 Charleston WV REC:

Suburban MD

1 Southern MD

Northern Virginia (NOVA) VA

1 Dulles VA

Great Lakes Area

REC 22 * Fort Wayne IN REC:

Chicago (C) IL

1 Irving Park Rd (Chicago N) IL

2 Lansing MI

3 Kalamazoo MI

3 Rockford IL

2 Fort Wayne IN

1 Muncie IN

3 Lafayette IN

2 Carol Stream IL

Indianapolis IN

* Bloomington IN

REC 36 * Peoria IL REC:

Palatine IL

2 South Suburban IL

2 Worcester (Central) MA

Royal Oak MI

1 Gary IN

* Terre Haute IN

1 Springfield MA

Detroit MI

REC 38 * Gary IN REC:

Grand Rapids MI

Fox Valley IL

Detroit MI

REC 41 Knoxville TN REC:

Saginaw MI

Carol Stream IL

REC 52 Madisonville KY REC:

Indianapolis IN

REC 53 Kalamazoo MI REC:

1 Springfield IL

2 Champaign IL

2 Peoria IL

1 Bloomington IL

2 South Bend IN

1 Flint MI

1 Kokomo IN

2 Traverse City MI

*Gaylord MI

3 Grand Rapids MI

3 Fox Valley IL

3 Saginaw MI

Mid-Atlantic

REC 18 Falling Waters WV REC:

- 1 Charleston WV
- 1 Clarksburg WV
 - 2 Roanoke VA
- 1 Lynchburg VA
 - 2 Huntington WV

REC 32 Salem VA REC:

- 1 Raleigh NC
 - 2 Greensboro NC
- 1 Hickory NC
 - 2 Rocky Mount NC

REC 29 *Newport News VA REC:

- Richmond VA
- Norfolk VA

REC 34 New Fayetteville NC REC:

- 1 Fayetteville NC
 - * Kinston NC
- Charlotte NC
 - 1 Asheville NC
 - 1 Charlottesville VA
- Richmond VA

REC 40 Charleston SC REC:

- Columbia SC
- Charleston SC
- 1 Greenville SC
 - 1 Florence SC

REC 51 *Louisville KY REC:

- Louisville KY
 - 1 Lexington KY
 - * Ashland KY
 - 1 Bowling Green KY
 - * London KY
 - 1 Evansville IN
 - * Paducah KY

Mid-West Area

REC 6 Wichita KS REC:

Kansas City MO

1 Kansas City KS

2 Wichita KS

Des Moines IA

3 Columbia MO

* Quincy IL

3 Fargo ND

*Bismarck ND

3 Sioux Falls SD

*Rapid City SD

4 Oshkosh WI

4 Waterloo IA

2 Topeka KS

1 Grand Island NE

1 Norfolk NE

REC 12 Des Moines IA REC:

Milwaukee WI

Omaha NE

1 Green Bay WI

1 Lincoln NE

1 Central WI P&DF (Rothschild) WI

REC 23 *Duluth MN REC:

Saint Paul MN

2 Madison WI

*Kingsford MI

Saint Louis MO

2 Eau Claire WI

2 Mankato MN

REC 28 *Davenport IA REC:

1 Springfield MO

Minneapolis MN

2 Quad Cities (Milan) IL

2 Rochester MN

*La Crosse WI

2 Cedar Rapids IA

1 Sioux City IA

1 Duluth MN

1 Cape Girardeau MO

2 Saint Cloud MN

New York Metro Area

REC 14 Kearny NJ REC:

1 Newark NJ
N. Jersey NJ (DVD)
Westchester (White Plains) NY
JFK NY
1 West Jersey NJ

REC 16 Lumberton NC REC:

Flushing (Queens) NY
1 Brooklyn NY
* Staten Island NY
1 Hackensack NJ

REC 31 * Princeton NJ REC:

1 Trenton NJ
1 Monmouth (Eatonton) NJ
Mid Island (Melville) NY
2 Kilmer (Edison) NJ
2 Mid-Hudson NY

REC 42 * Fishkill NY REC:

Manhattan NY #1
1 NJ Metro (Paterson) NJ
1 Bronx NY
Western Nassau NY
Manhattan #2 (Church) NY

REC 54 * Western Nassau NY REC:

1 Western Nassau NY
2 Hackensack NJ
2 Mid-Hudson NY
1 JFK NY

Northeast Area

REC 11 * Syracuse NY REC:

Hartford CT

Portland ME

1 Rochester NY

1 Bridgeport CT

2 Syracuse NY

2 Burlington VT

3 White River Junction VT

3 Elmira NY

REC 13 * Albany NY REC:

Boston MA

New Haven (Southern) CT

Manchester NH

1 Albany NY

1 Brockton MA

2 Waltham (Northwest) MA

2 Bangor ME

3 Stamford CT

3 Waterbury CT

REC 17 * Lynchburg VA REC:

Providence RI

Buffalo NY

Middlesex-Essex MA

* Cape Cod MA

1 Utica NY

1 Portsmouth NH

1 Binghamton NY

REC 19 * Nashua NH REC:

Brockton MA

Manchester NH

1 Burlington (Essex Jct.) VT

1 Bridgeport CT

Pacific Area

REC 20 * McAllen TX REC:

Marina (Inglewood) CA
Santa Clarita CA
Pasadena CA
* Mojave CA
1 Corpus Christi TX
Midland TX

1

REC 21 * Modesto CA REC:

Sacramento CA
1 Bakersfield CA
San Jose CA
2 Stockton CA
2 Marysville CA
* Reading CA
1 Salinas CA

REC 26 * San Bernardino CA REC:

Long Beach CA
* World WAY CA
Anaheim CA
Santa Ana CA

REC 30 * Selma CA REC:

San Francisco CA
1 Fresno CA
1 North Bay CA
Oakland CA

REC 33 * Riverside CA REC:

Industry (Alhambra) CA
San Bernardino CA
Los Angeles CA

REC 37 * Chula Vista CA REC:

M.L. Sellers (San Diego) CA
1 Oxnard CA
1 Santa Barbara CA
Honolulu HI

REC 49 * Hayward CA REC:

Oakland CA

Southeast Area

REC 7 * Chattanooga TN REC:

Atlanta GA

Jacksonville FL

1 Fort Myers FL

2 S. Florida (Pembroke Pines) FL 78

2 Gainesville FL

1 Gulfport MS

3 Pensacola FL

3 Tallahassee FL

REC 9 * Birmingham AL REC:

Miami FL

Birmingham AL

West Palm Beach FL

2 Manasota FL

2 Jackson MS

1 Savannah GA

1 Huntsville AL

1 Mobile AL

REC 24 * Tampa FL REC:

Tampa FL

1 Memphis TN

Orlando FL

1 Lakeland FL

1 Mid Florida (Lake Mary) FL

REC 44 * Antioch TN REC:

N Metro GA

* Atlanta AMC

Nashville TN

Ft Lauderdale FL

REC 45 * Bowling Green KY REC:

1 Saint Petersburg FL

2 Knoxville TN

* Johnson City TN

3 Chattanooga TN

* Jackson TN

2 Montgomery AL

1 Daytona Beach FL

* Panama City FL

3 Macon GA

* Albany GA CSF

3 Augusta GA

REC 46 * Jacksonville FL REC:

1 Mid Florida (Lake Mary) FL

2 Jackson MS

Pensacola FL

1 Tallahassee FL

2 Augusta GA

1 Mobile AL

Southwest Area

REC 4 * Sherwood AR REC:

Dallas TX
N Texas (Coppell) TX
Little Rock AR
 1 Fayetteville AR
 1 Tyler TX

REC 10 * Beaumont TX REC:

Houston TX
 1 N Houston TX
 2 Austin TX
 1 Beaumont TX
 2 McAllen TX
 3 Waco TX
 3 El Paso TX

REC 15 Laredo TX REC:

San Antonio TX

REC 27 * Tulsa OK REC:

Oklahoma City OK
Tulsa OK

REC 43 Abilene TX REC:

Fort Worth TX
 1 Amarillo TX
 • Abilene TX
 1 Lubbock TX

REC 47 * Baton Rouge LA REC:

 1 New Orleans LA
 2 Baton Rouge LA
 • Alexandria LA
 2 Shreveport LA
 1 Lafayette LA

REC 20 * McAllen TX REC:

Marina (Inglewood) CA
Santa Clarita CA
Pasadena CA
 1 Corpus Christi TX
 1 Midland TX

Western Area

REC 1 Salt Lake City UT REC:

Seattle WA
Salt Lake City UT
Portland OR
Albuquerque NM

REC 39 * Glendale AZ REC:

Las Vegas NV
Tucson AZ
Phoenix AZ
Colorado Springs CO
Denver CO

REC 50 Twin Falls ID REC:

1 Spokane WA
 • Pasco WA
1 Boise ID
Billings MT
 • Cheyenne WY

REC 55 Portland OR REC:

1 Everett WA
Tacoma WA
1 Salem OR
Reno NV Original install as Pasco
Eugene OR
2 Olympia WA
2 Anchorage AK

MASTER REC CLOSING SYNOPSIS

AREA	CLOSING REC(S)	PLANTS	GAINING REC	PLANT MOVE DATE	REC CLOSE DATE
Pacific	Hayward, CA	Oakland, CA	Seima, CA	09/01/99	09/01/99
	Closed				
Great Lakes	Knoxville, TN	Carol Stream, IL Saginaw, MI	Fl Wayne, IN Kalamazoo, MI	08/07/99 11/13/99	11/13/99
	Closed				
Great Lakes	Gary, IN	Grand Rapids, MI Fox Valley, IL Detroit, MI	Kalamazoo, MI Kalamazoo, MI Peoria, IL	08/21/99 10/02/99 01/22/00	01/22/00
	Closed				
NY Metro	W. Nassau, NY	Mid-Hudson, NY Hackensack, NJ W. Nassau, NY JFK, NY	Princeton, NJ Fishkill, NY Fishkill, NY Keamy, NJ	05/15/99 09/18/99 11/23/99 02/03/00	02/03/00
	Closed				
Midwest	Davenport, IA	Rock Island, IL Minneapolis, MN Rochester, MN Springfield, MO Cape Girardeau, MO Sioux City, IA Cedar Rapids, IA Duluth, MN Si Cloud, MN	Wichita, KS Wichita, KS Duluth, MN Duluth, MN Wichita, KS Wichita, KS Duluth, MN Duluth, MN Duluth, MN	11/06/99 01/08/00 01/29/00 01/29/00 02/26/00 02/26/00 03/25/00 03/25/00 03/25/00	03/25/00
Northeast	Nashua, NH	Brockton, MA Manchester, NH Bridgeport, CT Burlington, VT	Albany, NY Albany, NY Syracuse, NY Syracuse, NY	08/28/99 03/04/00 04/01/00 04/01/00	04/01/00
Midwest	Des Moines, IA	Lincoln, NE Wausau, WI Milwaukee, WI Omaha, NE Green Bay, WI	Wichita, KS Duluth, MN Wichita, KS Wichita, KS Wichita, KS	11/06/99 11/20/99 01/15/00 04/08/00 04/08/00	04/08/00
Southeast	Jacksonville, FL	Mid-Florida, FL Jackson, MS Pensacola, FL Tallahassee, FL Mobile, AL Augusta, GA	Tampa, FL Birmingham, AL Chattanooga, TN Bowling Green, KY Birmingham, AL Bowling Green, KY	09/04/99 10/16/99 03/18/00 05/27/00 05/13/00 05/27/00	05/27/00
Allegheny	York, PA	Wilmington, DE South Jersey, NJ Southeastern PA Lancaster, PA Reading, PA	Lehigh Valley, PA Dayton, OH Pittsburgh, PA Akron, OH Akron, OH	05/29/99 10/30/99 04/29/00 06/10/00 06/10/00	06/10/00
Southwest	Laredo, TX	San Antonio, TX	Beaumont, TX	06/17/00	06/17/00
Great Lakes	Madisonville, KY	Indianapolis, IN	Peoria, IL	06/24/00	06/24/00
New York Metro	Lumberton, NC	Brooklyn, NY Queens, NY	Princeton, NJ Princeton, NJ	02/19/00 07/15/00	07/15/00
Mid-Atlantic	Newport News, VA	Richmond, VA Norfolk, VA	Fayetteville NC Fayetteville NC	07/08/00 07/22/00	07/22/00

MASTER REC CLOSING SYNOPSIS

AREA	CLOSING REC(S)	PLANTS	GAINING REC	PLANT MOVE DATE	REC CLOSE DATE
Mid-Atlantic	Louisville, KY	Lexington, KY Bowling Green, KY Evansville, IN Louisville, KY	Salem, VA Salem, VA Salem, VA Salem, VA	03/18/00 05/06/00 05/06/00 08/05/00	08/05/00
Pacific	McAllen, TX	Marina, CA Pasadena, CA Santa Clarita, CA Corpus Christi, TX Midland, TX	San Bernardino, CA San Bernardino, CA Selma, CA Beaumont, TX Beaumont, TX	03/04/00 03/11/00 05/20/00 08/05/00 08/05/00	08/05/00
Southeast	Birmingham, AL	Jackson, MS Mobile, AL Menasota, FL Savannah, GA West Palm Beach, FL Miami, FL Huntsville, AL Birmingham, AL	Bowling Green, KY Bowling Green, KY Chattanooga, TN Chattanooga, TN Chattanooga, TN Chattanooga, TN Tampa, FL Tampa, FL	03/11/00 03/11/00 03/18/00 03/18/00 04/29/00 05/20/00 07/08/00 08/12/00	08/12/00
Great Lakes	Kalamazoo, MI	Peoria, IL South Bend, IN Kokomo, IN Springfield, IL Fox Valley, IL Saginaw, MI Champaign, IL Flint, MI Bloomington, IL Traverse City, MI Grand Rapids, MI	Fort Wayne, IN Fort Wayne, IN Fort Wayne, IN Fort Wayne, IN Fort Wayne, IN Peoria, IL Peoria, IL Fort Wayne, IN Peoria, IL Peoria, IL Fort Wayne, IN	03/11/00 03/11/00 03/25/00 03/25/00 04/22/00 05/13/00 06/03/00 06/03/00 07/01/00 07/01/00 08/19/00	08/19/00
Southwest	Tulsa, OK	Tulsa, OK Oklahoma City, OK	Sherwood, AR Sherwood, AR	02/19/00 08/19/00	08/19/00
Southeast	Antioch, TN	N Metro, GA Nashville, TN Ft Lauderdale, FL	Tampa, FL Bowling Green, KY Tampa, FL	02/26/00 05/20/00 08/26/00	08/26/00
Allegheny	Lehigh Valley, PA	Wilmington, DE Philadelphia, PA Lehigh Valley, PA	Pittsburgh, PA Akron, OH Akron, OH	04/15/00 07/29/00 09/02/00	09/02/00
Northeast	Lynchburg, VA	Providence, RI Buffalo, NY Binghamton, NY Middlesex-Essex, MA Portsmouth, NH Utica, NY	Albany, NY Albany, NY Albany, NY Syracuse, NY Syracuse, NY Syracuse, NY	05/13/00 06/03/00 06/10/00 08/16/00 09/16/00 09/16/00	09/16/00
Pacific	Chula Vista, CA	Honolulu, HI Santa Barbara, CA Oxnard, CA San Diego, CA	Modesto, CA Modesto, CA Modesto, CA Modesto, CA	06/27/00 07/29/00 09/16/00 10/21/00	10/21/00
Western	Portland, OR	Eugene, OR Tacoma, WA Everett, WA Salem, OR Anchorage, AK Olympia, WA Reno, NV	Salt Lake City, UT Glendale, AZ Salt Lake City, UT Salt Lake City, UT Salt Lake City, UT Salt Lake City, UT Glendale, AZ	10/07/00 11/11/00 01/13/01 01/20/01 01/27/01 01/27/01 02/24/01	02/24/01

MASTER REC CLOSING SYNOPSIS

AREA	CLOSING REC(S)	PLANTS	GAINING REC	PLANT MOVE DATE	REC CLOSE DATE
Southwest	Ablene, TX	Fl Worth, TX Amarillo, TX Lubbock, TX	Beaumont, TX Beaumont, TX Beaumont, TX	01/06/01 03/17/01 03/17/01	03/17/01
Pacific	Riverside, CA	Industry, CA San Bernardino, CA Los Angeles, CA	Modesto, CA Selma, CA San Bernardino, CA	06/17/00 06/26/00 04/28/01	04/28/01
Southwest	Baton Rouge, LA	New Orleans, LA Shreveport, LA Baton Rouge, LA Lafayette, LA	Sherwood, AR Sherwood, AR Sherwood, AR Sherwood, AR	02/17/01 02/17/01 05/19/01 05/19/01	05/19/01
Mid-Atlantic	Charleston, SC	Columbia, SC Charleston, SC Greenville, SC Florence, SC	Fayetteville, NC Fayetteville, NC Fayetteville, NC Fayetteville, NC	02/04/01 04/01/01 06/09/01 06/09/01	06/09/01
Mid-Atlantic	Falling Waters, WV	Clarksburg, WV Huntington, WV Roanoke, VA Charleston, WV Lynchburg, VA	Salem, VA Salem, VA Salem, VA Salem, VA Salem, VA	11/05/00 11/05/00 02/11/01 04/01/01 06/30/01	06/30/01

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T10-7. At how many different sites are CSBCS machines deployed?

Response: There are 3,681 CSBCS machines located at 1,204 sites.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T10-8. Please refer to your testimony at page 7, lines 21-28.

- a. Please confirm that the efforts to divert certified mail from the DPS mail stream to manual operations have the side effect of delaying delivery of certified mail compared to the speed of service that this mail would receive if it were non-certified First-Class Mail capable of being sorted by DPS. If you do not confirm, please explain why diversion of this mail to manual operations would not tend to cause some delays that would not occur if the letters were non-certified letters capable of being sorted by DPS.
- b. At which point(s) in the processing of certified letters, from collection to delivery and all points in between, does the Postal Service try to divert certified letters to manual processing?
- c. At which point(s) in the processing of certified letters is/are a plurality or majority of the certified letters that are diverted to manual processing diverted?
- d. Please explain any and all steps that the Postal Service takes to remove certified flats from the machinable -flats mail stream.
- e. Which percentage of otherwise-machinable certified letters and flats are processed manually?
- f. Which percentage of the total processing costs of certified letters and flats corresponds to costs that would be avoided if these letters and flats were machinable non-certified letters and flats.
- g. Are the extra costs discussed in (f) attributed to certified-mail service?
- h. Please provide the percentage of MPBCS, DBCS, and CSBCS machines that have certified-mail detectors and the plans and timetables for deploying additional detectors.
- i. Please discuss the extent to which the need to remove certified letters from the automated mail stream would decrease if all BCS machines had certified-mail detectors.
- j. Please discuss the success of the certified-mail detectors in trapping certified letters.
- k. Please confirm that processing costs for certified mail would decline if certified-mail detectors were deployed on all BCS machines, thus reducing or eliminating the need to process certified letters manually.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

- l. Please confirm that outgoing mail sorted in a manual operation to states subject to a three-day delivery standard generally is sorted using the ADC network. If you do not confirm, please explain.**
- m. Please confirm that outgoing mail sorted on automation to states subject to a three-day delivery standard generally is sorted using the AADC network. If you do not confirm, please explain.**
- n. Please confirm that sortation to the AADC network generally provides a finer level of sortation in the originating plant than sortation to the ADC network. If you do not confirm, please explain and provide specific examples.**
- o. Please confirm that mail sorted by the originating plant to the AADC level may have a better chance of being delivered sooner (e.g., in two days for a three-day delivery standard) than mail sorted to the ADC level.**
- p. Please confirm that glossy post cards are, in general, more expensive to process than white post cards that are not glossy and that can be processed on automation. If you do not confirm, please explain.**
- q. Please confirm that glossy post cards are, in general, more expensive to process than the stamped cards that the Postal Service sells. If you do not confirm, please explain your answer.**
- r. Assume X percent of glossy post cards and Y percent of stamped cards end up in a manual operation. (X and Y are positive numbers.) Please confirm that X probably is larger than Y. If you do not confirm, please explain.**

Response:

- a. I do not confirm. Certified mail is First-Class Mail and has the same service standard whether it is manual or automation.**
- b. Certified letters are not captured at collection point. They are culled in the mail preparation 010/020 area, when feeding distribution equipment, and on automation equipment modified with a certified mail detector. Certified letters are captured from outgoing processing through incoming secondary processing which includes the incoming secondary at delivery units.**
- c. The percentage of where certified letters are captured is not tracked.**
- d. In the keying and manual distribution operations the certified flats are culled out and sorted into a separate holdout to be processed. When the**

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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FSM is run in the OCR/BCR mode, the feeder may pull out certified flats or they are captured at the delivery unit to be handed over to the accountable clerk for assignment to the carrier.

- e. I do not know since the percentage of otherwise machinable letters/flats which are processed manually is not tracked.
- f. I do not know the percentage because data is not collected specific to certified mail in terms of how it is processed in the plants.
- g. I have been told that the costs attributed to the certified mail service are primarily window and delivery service related. The processing costs are accounted for in the postage of the host piece.
- h. Certified mail detectors have been installed on all DBCSs and CSBCSs. Certified mail detectors have been added to approximately 10% of the MPBCSs. I am told that installation of detectors on the remaining MPBCSs will occur within the next calendar year.
- i. If all BCS equipment had certified mail detectors and all certified machinable letters had the latest machine read-able certified label (not old label stock), there would be no need to remove certified mail from the automated mailstream.
- j. Initially there were some problems with software, however, after testing was completed, the detectors operated successfully.
- k. Processing costs would be reduced, given the response in g., this would apply only to the cost of the host piece and not the certified mail service.
- l. Confirm.
- m. Confirm.

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n. Confirm.

o. Confirm.

p. – r. I am unable to confirm since the Postal Service has not studied these cost differences. While glossiness can cause problems for automated processing, other factors can cause problems too. In particular, both stamped cards and private cards can cause problems in automation when extraneous matter encroaches into the barcode clear zone. Many private cards indicate a barcode clear zone to reduce the likelihood that mailers will write in that zone. See witness Miller's responses in Docket No. R97-1, Tr. 3/778-79.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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DFC/USPS-T10-9.

- a. Please explain current Postal Service procedures for processing bundled or trayed machinable single-piece First-Class metered letters that have a stale or incorrect meter date. (Please discuss only those procedures related to correcting the date on each envelope. For this interrogatory, please assume that the Postal Service decided to accept the metered mail, rather than returning it to the mailer to correct the date.)
- b. Please confirm that the introduction of EXFC as a measurement system has decreased the attention devoted to identifying or correcting stale or incorrect meter dates on bundled or trayed machinable single-piece First-Class metered letters.
- c. Please confirm that some stations, branches, or AO's may send containers of loose metered letters to the P&DC.
- d. Please confirm that the P&DC may correctly decide that, to maximize efficiency, the loose metered letters described in (c) should be fed into an AFCS machine for facing. If you do not confirm, please explain.
- e. Please confirm that the AFCS machine can be set to face but not cancel mail bearing only a meter indicia. If you do not confirm, please explain.
- f. If metered letters in (d) are fed into an AFCS machine, please provide current Postal Service policy on whether the AFCS should apply a cancellation.
- g. Please confirm that an AFCS machine that is set not to cancel meter indicia will not provide a correction on the mail piece for a stale or incorrect meter date.
- h. Please explain the proper procedure in a plant for processing bundles of correctly dated faced single-piece First-Class machinable metered letters.
- i. Please confirm that plants should not unbundle properly bundled and faced single-piece First-Class machinable metered letters that bear the correct date and run this mail through the culling system that leads to one or more AFCS machines.

Response:

- a. Metered First-Class letters with a stale date are overcancelled with correct date by either the AFCS or an OCR with an ink jet printer which prints the date in the upper right corner.
- b. Confirm. However, I am told that the procedure has always been to identify and correct stale or incorrect meter dates by an overcancel of the correct date.
- c. Confirm.
- d. Confirm.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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- e. Confirm.
- f. It is our policy to cancel stale meter dated First-Class Mail on the AFCS.
- g. Confirm.
- h. Metered bundles of First-Class Mail with the correct date are collected in the 010/020 mail preparation operation and unbundled and trayed prior to being sent to the OCR for sortation. However, there may be instances where the mail is unbundled and loaded directly at the OCR feeder.
- i. In most cases that is correct. However, there may be instances when the traying operation is completed and late collections contain a few small bundles that will be unbundled and run through the AFCS.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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DFC/USPS-T10-10

- a. Please provide the BCR/OCR acceptance rate for the FSM 881 when it is operating in BCR/OCR mode.
- b. Please refer to your testimony at page 11, lines 3-5. Does the throughput of 6,500 refer to total pieces, whether accepted or not?
- c. What is the normal throughput of an FSM 881 that is not operating in BCR/OCR mode?
- d. Please confirm that an operator must manually feed each flat into the FSM 881 when it is operating in BCR/OCR mode. If you do not confirm, please explain.
- e. Please explain why the BCR/OCR mode leads to greater efficiency compared to a manual-keying mode.
- f. Please explain the extent to which plants use the BCR/OCR mode for outgoing primary operations throughout the evening, given that a certain percentage of flats will reject and will have to be processed a second time, potentially causing mail to miss dispatches. For example, do plants typically stop using the BCR/OCR mode after a particular hour in the evening?
- g. Are single-piece First-Class flats that are processed successfully in BCR/OCR mode placed in containers that are labelled to indicate that the flats were processed successfully on the BCR/OCR?
- h. Will single-piece First-Class flats that are processed successfully in BCR/OCR mode in the outgoing primary operation typically be labelled so that these flats can, if necessary, be processed in BCR/OCR mode on the outgoing secondary operation in that plant as well?
- i. Which percentage of single-piece First-Class flats that are processed on the FSM 881 are processed on the FSM 881 in BCR/OCR mode?
- j. If machine capacity is limited, is the Postal Service more likely, on an FSM 881 that is running in BCR/OCR mode, to run metered single-piece First-Class flats rather than stamped single-piece First-Class flats?
- k. To which extent do prepping operations make separations between FSM 881-compatible flats and non-FSM-881-compatible flats? Or are the FSM 881 crews typically responsible for removing a substantial portion of the flats that are not compatible with the FSM 881?
- l. Which percentage of single-piece First-Class flats that could be processed on the FSM 881 are processed manually due to capacity constraints on the FSM 881's and FSM 1000's?
- m. Can the FSM 1000 run simultaneously in BCR and manual-keying modes, thus allowing operators to bypass manual keying if a particular flat has a bar code on it?

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- n. Does the FSM 1000 have an automatic feeder for bar-coded flats?
- o. Which is the finest level — carrier route or sector-segment — to which bar-coded flats currently are processed on either the FSM 881 or FSM 1000?
- p. Please reconcile the following two statements in your testimony: "The net result was that 60 percent of the total incoming secondary volume in plants was processed on flat sorters" (page 14, line 30 to page 15, line 1) and "The majority of incoming secondary distribution of flats is performed manually in delivery units in the current environment largely because of the shortfall in mechanized flats sorting capacity" (page 15 lines 12-14). Which percentage of machinable flats receives incoming secondary sortation on FSM's?
- q. Please describe the methods used for sorting Priority Mail Flat Rate Envelopes (e.g., envelope EP-14F).

Response:

- a. The acceptance rate is from 80-96% depending upon mail type.
 - b. Yes — it refers to total number of pieces fed to the machine.
 - c. The throughput of an FSM 881 in keying mode is influenced by whether scheme knowledge is required. The throughput ranges from 4500 to 5500.
 - d. Confirm.
 - e. The flat does not have to be faced for the keyer since the BCR/OCR can read an address upside down, horizontally or vertically. It also does not require time for a keyer to find the address among the other graphics on the mail piece. A lower level clerk without keying skills can be used to feed the flats into the FSM in BCR/OCR mode.
 - f. The BCR/OCR is used approximately 50 percent for outgoing primary operations and keying mode the other 50 percent. Yes, depending on the volume and accept rates specific to the mail.
 - g. Yes.
-

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- h. Yes.**
 - i. Percentages are not tracked by class of mail or by single-piece or presorted mail.**
 - j. Yes.**
 - k. Separations between FSM 881 compatible and non-compatible flats are done to the greatest extent possible in prepping operations. The FSM 881 crews are not typically responsible for removing a substantial portion of FSM 881 non-compatible flats but will do so whenever necessary.**
 - l. I believe very little First-Class Mail is diverted to the manual operation due to capacity constraints since First-Class Mail is a small portion of flat volume, has priority on the FSMs, and is not the driver for equipment requirements.**
 - m. No. The feed stations must be either in BCR or keying mode. Hence, if a keyer sees a barcode while in keying mode, the flat still needs to be keyed.**
 - n. No.**
 - o. Carrier route.**
 - p. The first statement refers specifically to incoming secondary flat distribution occurring in the plants. The second statement is referring to all incoming secondary flat distribution at plants and delivery units. I am told the breakdown of total incoming secondary flats distribution is approximately 60% occurring at delivery units and 40% occurring at plants. Of the plant incoming secondary distribution, approximately 60% is processed on flats sorters and 40% is manual. I am told that the percentage of *machinable* flats receiving incoming secondary distribution on FSMs is unknown since we do not track machinable verses non-machinable volumes.**
-

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- q. The Priority Mail Flat Rate Envelopes are processed in manual operations,
mechanized operations (FSM 1000), and on the SPBS.
-

DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley

Date: 2-22-2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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February 22, 2000