

**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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(PostCom/USPS-T-10-4-6)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-10-4-6. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/USPS-T-10-4 Please refer to witness Smith's response to DMA/USPS-T21-2(f), which states: "I am told that the Postal Service is addressing these concerns beyond the base year, through the deployment of the OCRs to the FSM 881 and the deployment of the AFSM 100. The AFSM 100s will initially reduce manual work hours and, as deployment proceeds, start replacing FSM 881s. In the interim, the OCRs on the FSM 881s will eliminate the need to maintain separate barcoded and nonbarcoded mailstreams, a requirement that proved operationally cumbersome. The OCRs on the FSM 881s will also reduce costs by reductions in operator keying time."

(a) Please provide a schedule for deploying OCRs on FSM 881s. If a deployment schedule is currently unavailable, please explain when a deployment schedule will be available.

(b) On what percentage of FSM 881s do you plan to deploy OCRs?

(c) What is the annual workhour reduction that would result from deploying OCRs on one FSM 881? Please provide all underlying calculations and disaggregate the workhour savings into the two categories referenced above: elimination of the need to maintain separation mailstreams and reduction in operator keying time.

(d) What is the annual workhour reduction that would result from deploying OCRs on all FSM 881s? Please provide all underlying calculations and disaggregate the workhour savings into the two categories referenced above: elimination of the need to maintain separation mailstreams and reduction in operator keying time.

(e) Please confirm that these savings are not reflected in LR-I-126 or LR-I-127. If not confirmed, please provide a citation to where these savings are incorporated in the roll forward.

(f) Is the Postal Service also planning on deploying OCRs on FSM 1000s? If not, is the Postal Service considering deploying OCRs on FSM 1000s? If the Postal Service is considering deploying OCRs on FSM 1000s, when will the Postal Service be making a decision on whether to deploy OCRs on FSM 1000s?

(i) If the Postal Service is planning to deploy OCRs on FSM 1000s, please provide a schedule for deploying OCRs on FSM 1000s and the percentage of FSM 1000s upon which you

plan to deploy OCRs. If a deployment schedule is currently unavailable, please explain when a deployment schedule will be available.

(ii) What is the annual workhour reduction that would result from deploying OCRs on one FSM 1000? Please provide all underlying calculations and disaggregate the workhour savings into the two categories referenced above: elimination of the need to maintain separation mailstreams and reduction in operator keying time.

(iii) What is the annual workhour reduction that would result from deploying OCRs on all FSM 1000s? Please provide all underlying calculations and disaggregate the workhour savings into the two categories referenced above: elimination of the need to maintain separation mailstreams and reduction in operator keying time.

(iv) Please confirm that these savings are not reflected in LR-I-126 or LR-I-127. If not confirmed, please provide a citation to where these savings are incorporated in the roll forward.

(v) Please provide throughput per hour and crew size for an FSM 1000 with an OCR.

PostCom/USPS-T-10-5. Is the Postal Service planning to deploy automatic feeders on FSM 881s and FSM 1000s?

(a) If not, why not?

(b) If not, is the Postal Service considering deploying automatic feeders on FSM 881s and FSM 1000s? If so, when will the Postal Service be making a decision on whether to deploy automatic feeders on FSM 881s and FSM 1000s?

(c) If the Postal Service is planning to deploy automatic feeders, please provide a schedule for the deployment. If a deployment schedule is currently unavailable, please explain when a deployment schedule will be available. Also, please indicate the percentage of FSM 881s and 1000s upon which you plan deploying automatic feeders.

(d) Please provide throughput per hour and crew size for FSM 881s and FSM 1000s with OCRs and automatic feeders.

(e) What is the annual workhour reduction that would result from deploying automatic feeders on one FSM 881? Please provide all underlying calculations.

(f) What is the annual workhour reduction that would result from deploying automatic feeders on all FSM 881s? Please provide all underlying calculations.

(g) What is the annual workhour reduction that would result from deploying automatic feeders on one FSM 1000? Please provide all underlying calculations.

(h) What is the annual workhour reduction that would result from deploying automatic feeders on all FSM 1000s? Please provide all underlying calculations.

(i) If so, please confirm that these savings are not reflected in LR-I-126 or LR-I-127. If not confirmed, please provide a citation to where these savings are incorporated in the roll forward.

PostCom/USPS-T-10-6. Please refer to the Advanced Flat Sorting Machine (AFSM) paragraph on page 6 of LR-I-126. In particular, note the final sentence, which states "Savings for FY 2001 were estimated to decrease 2,715,000 hours for clerks (1,086 machines x 2,500 hours per machine) and cost was estimated to increase by 410,000 hours for maintenance (1,086 machines x 377.5 hours)."

(a) Is the number of AFSM machines mentioned in this paragraph consistent with the first deployment of AFSM 100s that you discuss in your testimony?

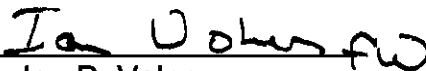
(b) Is the "2,500 hours per machine" savings estimate consistent with the savings that you think should result from deploying one AFSM 100

(c) Is the "377.5 hours per machine" increase in maintenance workhours consistent with the increase that you think should result from deploying one AFSM 100?

(d) If your response to any of the above was no, please provide revised estimates of the reduction in clerks workhours and increase in maintenance workhours that would result from the first deployment of AFSM 100s.

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.



Ian D. Volner