

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

RECEIVED
FEB 25 2 39 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS KINGSLEY**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Kingsley: DMA/USPS-T10, Nos. 48-60. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Dana T. Ackerly II, Esq.
COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-5296

Counsel for the Direct Marketing
Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Dana T. Ackerly II

Dated: February 25, 2000

DMA/USPS-T10-48. In your response to DMA/USPS-T10-4, you say “New software will be tested in March with contract award expected sometime after that.” When do you anticipate contract award? When do you anticipate the start of implementing this new software? When will the implementation be complete?

DMA/USPS-T10-49. Please estimate the labor savings and the cost savings associated with the implementation of the new software cited in your response to DMA/USPS-T10-4.

DMA/USPS-T10-50. Please refer to your response to DMA/USPS-T10-6. What are the employees of the RECs who are not TEs? Please confirm that the ratio of non-TEs to TEs is estimated to increase according to your response. Please explain why.

DMA/USPS-T10-51. Please refer to your response to DMA/USPS-T10-8. If service standards for First-Class Mail were less stringent than they are now, but more stringent than those for Standard A Mail, could staffing be reduced?

DMA/USPS-T10-52. Please refer to your response to DMA/USPS-T10-16. Is there an anticipated schedule for when technical and procurement issues will be resolved? If so, please provide it.

DMA/USPS-T10-53. Please refer to your response to DMA/USPS-T10-24. Please provide an estimate of the work year and the cost savings from this shift.

DMA/USPS-T10-54. Please refer to your response to DMA/USPS-T10-26. Please provide an estimate of the work year and the cost savings from this increase in the percentage of barcoding on non-carrier route flats.

DMA/USPS-T10-55. Please refer to your response to DMA/USPS-T10-36. In your response, you say, “If a site has too many sacks to dump, the savings are not there” as one of two explanations as to why not all “SPBS machines will have feed systems. Please explain why “too many sacks” changes the economics of feed systems. How many sacks are “too many”? Please provide studies or analysis in support of this number. Please provide an electronic spreadsheet showing how many sacks are dumped at the sites with feed systems and at those sites with feed systems under contract. Please provide another spreadsheet showing the number of sacks to be dumped at those sites where you have concluded feed systems would not be economic.

DMA/USPS-T10-56. Please refer to your response to DMA/USPS-T10-37. Please describe the status of USPS plans to improve existing equipment.

DMA/USPS-T10-57. Please refer to your response to DMA/USPS-T10-37. When do you anticipate piloting the next generation of SPBS machines? Are these engineering designs, conceptual, or preconceptual designs for these machines?

DMA/USPS-T10-58. Please refer to your response to DMA/USPS-T10-33. Is the rate-limiting factor in SPBS throughput the keying rate? If not, what is the rate-limiting factor? Please fully explain your answer and provide any studies, which support it.

DMA/USPS-T10-59. On page 14 of your testimony you say “In AP 13, FY 99, Processing and Distribution plants processed 48 percent of their incoming flat secondary volume using the BCR/OCR on flat sorters...” Please provide an estimate of this percentage for the Test Year.

DMA/USPS-T10-60. You go on to say “Keying operations on the flat sorter accounted for another 12 percent of their total incoming secondary flat volume.” Please provide an estimate of this percentage for the Test Year.