

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

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

**First Set of Interrogatories of
National Newspaper Association
to USPS Witness Kingsley (T10 1-25)**

Pursuant to Section 20 of the Commission's Rules of Practice, the National Newspaper Association (NNA), hereby submits the attached interrogatories to the United States Postal Service Witness Kingsley (NNA/USPS T-10-1-24.)

Respectfully Submitted

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QUESTIONS

Please respond in detail to the questions submitted. If you cannot answer a question because it is beyond your area of expertise, please refer it to another USPS witness who can respond.

NNA/USPS T10-1. Please respond to the following questions with respect to broken bundles:

- a. At which point in operations are bundles most likely to break? (e.g., opening units, bundle sorters, dock transfers, etc.)
- b. Please explain the procedure required in FY 99 for handling of broken bundles, including any steps workers are required to take to preserve the sorting scheme within bundles after breakage.
- c. Please explain any changes in the procedure described in b. that have been prescribed for FY 2000 or beyond.
- d. Are there circumstances where a worker might reassemble a collection of broken bundles without regard to the presort or destination levels within the original bundles?

NNA/USPS T10-2. Please confirm that no FSM 1000 presently in operation is equipped with Optical Character (OCR) readers.

NNA/USPS T10-3. If your response to NNA/USPS T10-2 is yes,

- a. Please state whether it would have been technologically feasible to

install OCRs in the initial deployment of FSM 1000s,

b. Please state why FSM 1000s were not equipped with OCRs prior to original deployment.

NNA/USPS T10-4. Please refer to the statement in your testimony on p. 11, lines 12-14.

a. Please explain why USPS has decided, if it has decided, that OCR's should be added to the FSM 1000s;

b. What degree of certainty causes you to state that it is "probable" that OCRs will be added to FSM 1000s;

c. What throughput will you expect from FSM 1000s after OCRs are installed?

NNA/USPS T10-5. Please respond to the following questions with respect to a flat mailpiece consisting of newsprint weighing approximately four ounces and with the dimensions of 11 inches by 14 inches, (or a half-folded broadsheet):

a. Will the FSM 881 process this mailpiece if it has a barcode?

b. Will the FSM 881 process this mailpiece if it has no mailer applied barcode, but has an OCR readable address?

c. Will the FSM 1000 process this mailpiece if it has a barcode?

d. Will the FSM 1000 process this mailpiece if it has no mailer applied barcode, but has an OCR readable address?

e. Will the AFSM 100 process this mailpiece if it has a barcode?

f. Will the AFSM 100 process this mailpiece if it has no mailer applied

barcode, but has an OCR readable address?

NNA/USPS T10-6. If an AFSM 100 machine will not process the half-folded newspaper described in NNA/USPS T10-5, please respond to the following;

- a. Please explain what characteristic of this mail would cause it to be ineligible for processing by this machine;
- b. please describe any steps or deliberations the Postal Service took during the design and development specifications for this machine to produce a machine that would be able to handle this mail piece;
- c. what additional cost in design or development of the AFSM 100 would have resulted if the Postal Service had required the capabilities of the machine to sort this type of mail?

NNA/USPS T10-7. Please assume that following full deployment of the AFSM 100s, a given Processing and Distribution Plant has no FSM 881s on site and the FSM1000 has either been taken down for a given tour or is no longer in operation at that plant. If an AFSM 100 was unable to handle the newspaper piece described in NNA/USPS T10-5, how would you expect the piece to be handled:

- a. In outgoing primary sort?
- b. In outgoing secondary sort?
- c. In incoming primary sort?
- d. In incoming secondary sort?

NNA/USPS T10-8. Please explain why the USPS plans no further purchase of FSM 1000s.

NNA/USPS T10-9. Please refer to your statement on p. 18, lines 3 through 10.

- a. Would a mailer of carrier route bundles be required to prepare mail in walk sequenced sorts if the bundle was entered at the delivery unit?
- b. Does the Postal Service plan at the point where the DPS capability is fully developed, as you state in your testimony, to alter eligibility for or in any way diminish the ability of mailers to prepare carrier route bundles for entry at the delivery unit?
- c. Will the machinery that you envision in this section of your testimony handle the newsprint piece described in NNA/USPS T10-5?
- d. If your answer to c. is no, please state whether the mailers of a carrier route bundle be required in the environment you envision in this section to prepare mail in Delivery Point Sequencing and explain the rationale for such a requirement.

NNA/USPS T10-10. Please confirm that the intended effect of the deployment of AFSM100s is to move some mail from downstream delivery units for outgoing secondary sort to a point further upstream where flat processing machinery will perform the sort.

NNA/USPS T10-11. If you confirmed NNA/USPS T10-10, please provide an estimate of the percentage of the following types of mail that is likely to be moved upstream for processing:

- a. Letter mail
- b. Flat mail that can be processed on an AFSM 100
- c. Flat mail that cannot be processed on an AFSM 100.

NNA/USPS T10-12. If you confirmed NNA/USPS T10-11, please assume a local newspaper is entered in a carrier route bundle at a local post office for delivery to a point outside the county and at least 20 miles away. If delivery took one day in 1999 in an area where the outgoing secondary operation was handled at the destination post office, how many days would you expect the change in outgoing secondary processing to add to the delivery time? Please explain your response in detail.

NNA/USPS T10-13. Please provide the physical dimensions in required floor space (i.e., the "footprint") of the:

- a. FSM 881
- b. FSM 1000
- c. AFSM 100

NNA/USPS T10-14. Please explain the operational steps required to "set up and

pull down" an FSM 1000, as you mean those terms on page 12 of your testimony and provide an estimate of the amount of time required to carry out the totality of those steps.

NNA/USPS T10-15. Please explain whether the following circumstances cause a flat mail piece eligible for sorting on the FSM 1000 to be sorted manually and why such a decision would be made by a plant manager:

- a. the volume of that type of mail to be sorted on that tour is low;
- b. another type of mail is occupying the machine during the service window;
- c. plant personnel deem the "set up and pull down" time to be longer than the time that would be required for a manual sort;
- d. workers are on hand during that tour who are otherwise unoccupied.

NNA/USPS T10-16. You stated on p.14 of your testimony that the rate of growth of conversion to mailer-applied bar codes has slowed significantly since 1997. Please state the reasons for this slowdown.

NNA/USPS T10-17. Please state whether the Postal Service will no longer encourage mailer application of barcodes to flat pieces after it has reached a point where maximum deployment of OCR's and other reading equipment has been installed on flat sorting machines. If your answer is no, please explain why the Postal Service would continue to find mailer applied barcodes of value.

NNA/USPS T10-18. You stated on p. 14 in your testimony that lack of machine capacity has caused a "decentralization" of processing.

- a. Does this statement mean that you believe outgoing secondary sorts were once more "centralized" than in days before automation
- b. If your answer to be is yes, please explain what year the trend to "decentralization" began.

NNA/USPS T10-19. Please estimate the approximate relative percentage of plastic sacks and canvas sacks being used during the base year and predicted for the test year by the Postal Service for periodicals mail.

NNA/USPS T10-20. Please provide the unit cost of a canvas sack and the unit cost of a plastic sack.

NNA/USPS T10-21. Please confirm that the Postal Service has increased the usage of plastic sacks in the past three years and explain the rationale for doing so.

NNA/USPS T10-22. Please respond to the following questions regarding use of plastic sacks for periodicals mail.

- a. Do all plastic sacks employ plastic closers or grippers instead of metal closers or grippers?

- b. Has the Postal Service observed a higher incidence of periodicals spilling from sacks with plastic grippers than from sacks with older style metal grippers?
- c. If the Postal Service has collected any data or conducted any studies with regard to the phenomenon of periodicals mail spilling from sacks, please provide that data or those studies.

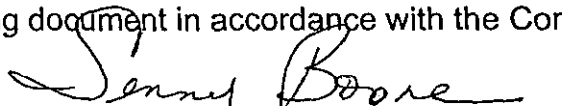
NNA/USPS T10-23. Does the Postal Service use the term "news belt" to describe the work functions in any aspect of mail processing? If so, please explain it.

NNA/USPS T10-24. What quality control measures does the Postal Service use to ensure that newspapers in a plant for outgoing primary or incoming secondary sort are not delayed or aggregated so that multiple issues are delivered together?

NNA/USPS T10-25. Please explain the basis of your assumption that flat and parcel volume is expected to increase, as you state in your testimony on page 28, including specific references to studies, analyses or testimony performed by the Postal Service that predicts growth in flat volume.

Certificate of Service

I hereby certify that I have on this 29 day of February, 2000, served the foregoing document in accordance with the Commission's Rules of Practice.


Senny Boone