

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

**NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS  
LINDA A. KINGSLEY (NAA/USPS-T10-1-18)  
March 1, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Linda a. kingsley (NAA/USPS-T10-1-18) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

March 1, 2000

William B. Baker  
William B. Baker

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NAA/USPS-T10-1: Please refer to your testimony at page 26, lines 27-28, where you state that "DPS reduces office time by saving each carrier up to 1 ½ hours a day for casing letters."

- a. Please provide the basis for this statement, including all underlying data, and indicate for which geographical area and time period this saving applies.
- b. To the extent not answered in part (a), please estimate this saving by each of FY99, FY00, and FY01. If you are unable to provide estimates for these figures, please defer the request to the Postal Service.

NAA/USPS-T10-2. Please refer to your testimony at page 27, lines 12-14, where you state: "Motorization has gradually eliminated many walking routes and increased the proportion of carriers with vehicles from 85 percent in FY 88 to 91 percent in FY 98."

- a. Please provide the basis for this statement, including all underlying data, and indicate for which geographical area this increase applies.
- b. Please estimate this factor for each of FY99, FY00, and FY01. If you are unable to provide estimates for these figures, please defer the request to the Postal Service.

NAA/USPS-T10-3. Please refer to your testimony at page 27, lines 16-18 at which you state: "Finally, coverage, the proportion of delivery points receiving mail on any one day, has increased to 85 percent, so there is less travel time without useful activity at a delivery point."

- a. Please provide the basis for this statement, including all underlying data, and indicate for which geographical area and time period this saving applies.

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- b. To the extent not answered in part (a), please estimate this factor for each of FY99, FY00, and FY01. If you are unable to provide estimates for these figures, please defer the request to the Postal Service.

NAA/USPS-T10-4. Please refer to your testimony at page 27, lines 20-21 at which you state: "First, there were 5.6 pieces per delivery in FY 98 compared to only 5.1 in FY 88. Flats volume has grown during this time;" lines 25-26 at which you state that "Increases in parcel deliveries per route would also account for carriers spending a little more time per delivery;" and page 28, lines 8-9 at which you state that "Parcel and flat volumes are expected to increase."

- a. Please provide the basis for these statements, including all underlying data, and indicate for which geographical area and time periods these increases apply.
- b. Please estimate these factors, in total and separately for flats and parcels, for each of FY99, FY00, and FY01. If you are unable to provide estimates for these figures, please defer the request to the Postal Service.
- c. Please confirm that the second statement that "increases in parcel deliveries per route would also account" refers to increases that "did" occur.
- d. If (c) is not confirmed, please provide the intent of the statement.

NAA/USPS-T10-5. Please refer to your testimony at page 28, lines 4-6 at which you state that "In summary, comparing FY 88 to FY 98, today's city carriers average an additional 25 minutes on the street delivering 8 percent more mail to 2 percent fewer delivery points."

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- a. **Please provide the basis for this statement, including all underlying data, and indicate for which geographical area these figures apply.**
- b. **Please estimate these factors for each of FY99, FY00, and FY01. If you are unable to provide estimates for these figures, please defer the request to the Postal Service.**

**NAA/USPS-T10-6. Please provide the best available estimate of the number of delivery points for each type of city carrier route.**

**NAA/USPS-T10-7. How many carrier routes are served by a typical delivery unit? If this information is difficult to obtain, please provide your best estimate and the likely range.**

**NAA/USPS-T10-8. Please refer to the discussion of Delivery Bar Code Sorters at page 5 of your testimony.**

- a. **When did the deployment of DBCS equipment begin?**
- b. **In what types of facilities will the "additional 270" sorters be deployed?**

**NAA/USPS-T10-9. Please refer to page 6, lines 6-13 of your testimony. Are Carrier Sequence Bar Code Sorters used to sort:**

- a. **First Class letters with Standard (A) Regular letters?**
- b. **First Class letters with Standard (A) Enhanced Carrier Route letters?**

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**NAA/USPS-T10-10.** Please refer to page 25, lines 21-23 of your testimony, where you state that in “many cases, ECR letters are transported from the delivery unit to the processing plant to be barcoded on an OCR and sorted in with DPS letters on a DBCS.”

- a. What proportion of ECR letters are expected to be transported back to the processing plant for this purpose in the Test Year?
- b. Are ECR letters sorted in with First Class letters in this process?

**NAA/USPS-T10-11.** After ECR letters are sorted in with DPS letters on a DBCS, are the ECR letters handled or delivered any differently from that point on than First Class letters that they are sorted in with?

**NAA/USPS-T10-12.** Are detached address labels associated with saturation mailings ever run on barcode sorters? If your answer is yes, please explain the circumstances in which this would occur.

**NAA/USPS-T10-13.** Please refer to page 25, lines 28-29 of your testimony, where you state that flats in line-of-travel sequence allow for “very efficient casing.” Please identify the most recent Postal Service analysis of the relative casing efficiency of mailings prepared in line-of-travel compared to other methods of sequencing, including walk-sequencing, and provide a copy if it is not already part of the record in a Commission proceeding.

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NAA/USPS-T10-14. Please how a city carrier handles a Standard (A) Enhanced Carrier Route saturation mailing with detached addressed cards while in-office.

NAA/USPS-T10-15. Please describe how casing of flats differs depending upon whether vertical flats cases or horizontal flats cases are used.

NAA/USPS-T10-16. Please describe how a city carrier handles a Standard (A) Enhanced Carrier Route saturation mailing during street delivery. Please include in your explanation a discussion of:

- a. How the delivery of detached address label saturation mailings differs by type of route?
- b. In what instances in detached address label saturation mailing is carried as a third bundle?
- c. In what instances in detached address label saturation mailing is carried as a fourth bundle?
- d. In what situations a carrier will handle the detached address label and the associated flats separately?
- e. Please indicate, where appropriate, how delivery of such mailings in the Test Year is expected to differ from current practice.

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**NAA/USPS-T10-17.** Please refer to page 26, lines 4-5 of your testimony.

- a. Please explain what you mean by "depending on the service required."
- b. In situations where a carrier receives more than one customer supplied saturation walk sequenced mailing bundles to be delivered on the same day, how is it decided which mailing is cased and which is carried as a third bundle?

**NAA/USPS-T10-18.** Please refer to page 27, line 1 of your testimony. What do you mean by "assistance" that is provided to the carrier?