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

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
KINGSLEY TO INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS  
(ANM/USPS-T10-32(a)) -- ERRATUM  
(March 3, 2000)

The United States Postal Service hereby provides a supplemental response to the following interrogatory of the Alliance of Nonprofit Mailers: ANM/USPS-T10-32(a), filed on February 7, 2000. The original response was filed on February 22, 2000.

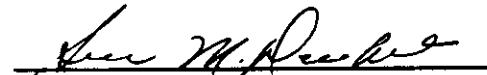
After further review, it was determined that more specific information would be useful for a better understanding of the plans for TMS. The supplemental response to subpart (a) discusses only P&DCs and P&DFs when describing the facilities with and without TMS by FY 20001.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990 Fax -5402  
March 3, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS**

**ANM/USPS-T10-32** In your testimony at page 24, lines 20-22, you state that "The TMS system has been deployed to 17 facilities, with 15 more plants to come on-line by FY 2001. Plans are to extend the system to most large and medium facilities."

- a. Aside from the 32 facilities that will have a TMS system by FY 2001, how many large facilities will NOT have a TMS system
- b. Aside from the 32 facilities that will have a TMS system by FY 2001, how many medium facilities will NOT have a TMS system?
- c. How many years will the Postal Service require to extend the TMS system to most large and medium facilities under the plans that you mention in your testimony?
- d. Please produce all studies, analyses and similar documents produced by or for the Postal Service concerning the costs, benefits, and appropriate deployment rate of the TMS system.

**Response:**

- a. It was not my intention to indicate that there is a strict designation of plants based on small, medium, and large. Consequently, numbers can not be provided specifically for large or medium facilities. There are 251 P&DCs and P&DFs in the Postal Service leaving 219 without TMS by FY 2001.
- b. See response for a.
- c. It is not known at this time. It is now my understanding that though it is still the goal of the Postal Service to automate more of the material handling functions related to tray staging, sorting, and movement in a majority of the existing medium to large facilities, the exact technology that will perform the TMS functions is currently being reevaluated and may or may not ultimately vary from the current configurations. Any deployment schedules will be subsequent to this evaluation.
- d. Objection filed February 22, 2000.

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: 3-3-2000

**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.

  
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Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990 Fax -5402  
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