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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

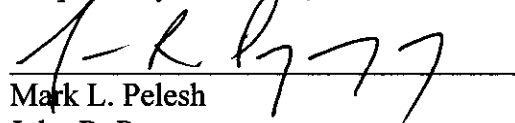
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**SECOND SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO USPS WITNESS KINGSLEY AAP/USPS-T10-2-13**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publishers (AAP), hereby submits the following interrogatories and request for production of documents to USPS witness Kingsley (USPS-T-10). AAP incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed January 24, 2000). If the designated witness is unable to respond to any interrogatory, or any part therein, we request a response by some other qualified witness.

Respectfully submitted,

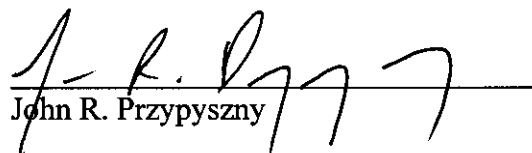


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding.



Date: March 7, 2000

**SECOND SET OF INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

AAP/USPS-T10-2 On pages 18-19 of your testimony you describe Primary and Secondary Parcel Sorters used at Bulk Mail Centers (BMCs) and at Auxiliary Service Facilities (ASFs). On page 21 of your testimony you describe the manner in which bundles are sorted at BMCs and mail processing plants. With respect specifically to Bound Printed Matter (BPM) that arrives at a BMC on a pallet:

- (a) Please list and describe all considerations that would affect whether the BPM would be processed using Parcel Sorters instead of Bundle Sorters or vis versa.
- (b) Please list and describe all considerations that would affect whether the BPM would be processed using Parcel Sorters instead of Manual Sortation or vis versa.

AAP/USPS-T10-3 On page 20-21 of your testimony, you describe the Small Parcel Bundle Sorter (SPBS). You state that for certain bundle sorting operations, “[t]he SPBS is the equipment of choice.” Please state or estimate the frequency with which BPM bundles are sorted using SPBP verses other types of mechanical or manual sortation.

AAP/USPS-T10-4 Please indicate the current weight limits (maximum and minimum) for bundles sorted on the SPBS. Please describe whether and how these weights would be checked by employees operating the SPBS.

AAP/USPS-T10-5 Please list and describe each of the most typical conditions under which bundles of Bound Printed Matter would be sorted by the Linear Integrated Parcel Sorters (LIPS) equipment instead of the SPBS.

AAP/USPS-T10-6 Please list and describe each of the most typical conditions under which bundles of Bound Printed Matter would be sorted manually and not by the SPBS.

AAP/USPS-T10-7 Please list and describe each of the most typical conditions under which bundles of Bound Printed Matter would be sorted manually and not by the LIPS.

AAP/USPS-T10-8 On page 22 (lines 18-19) of your testimony, you describe the new technology for reducing manual labor associated with mechanized parcel sortation in BMCs.

Please provide a mathematical example that quantifies the degree to which the new equipment will reduce manual labor associated with mechanized parcel sortation at BMCs.

AAP/USPS-T10-9 On page 23 (lines 27-29) of your testimony, you describe allied operations and state “[e]xcept for the cancellation operation, volume is not consistently measured for these operations due to the difficulty of measuring the workload, so piece productivities cannot be calculated.” Please confirm that although the IOCS system measures direct tallies associated with allied operations such as Pouching and Platform, the Postal Service does not consistently measure mail volume associated with these activities.

AAP/USPS-T10-10 On page 23 (lines 18-21) of your testimony, you state that “[p]latform consists of the activities required to load and unload mail from trucks, identifying container contents for movement to the appropriate operation, and moving containers to and from the docks and operations.” With respect to the activities that constitute platform operations:

- (a) Please provide any estimates of the BPM mail volume attributed to each of these activities during 1998.
- (b) Please provide any estimates of the BPM mail volume projected for each of these activities for the test year after rates in this case.
- (c) Please provide any trend information maintained by the Postal Service that shows or identifies trends in the number of employees, work hours and accrued costs associated with platform operations since 1995.

AAP/USPS-T10-11 On page 23 (lines 29-30) of your testimony, you state that “allied functions are still closely monitored because of their impact on service and cost.” With respect to this statement please identify and provide all studies or reports maintained showing that the Postal Service “closely monitored” allied functions during 1998.

AAP/USPS-T10-12 On page 24 of your testimony, with respect to allied operation costs, you state that “costs have appeared more significant over time because our automation and mechanized efforts have reduced costs in distribution operations much more than in allied operations.” Please identify and provide all studies, reports, data or other evidence that you relied upon to support this statement.

AAP/USPS-T10-13 On page 34 of your testimony, you state that “[w]e retain Priority Mail, Periodicals and Standard Mail (A) within the main plant whenever possible.” With respect to this statement, please explain why the Postal Service has adopted this policy only for these particular subclasses. Please describe or identify particular service standards for any of these subclasses that support this policy.