

**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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS YACOBUCCI
(PostCom/USPS-T-25-4-5)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories USPS witness Yacobucci: PostCom/USPS-T-25-4-5. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

PostCom/USPS-T-25-4. Please refer to LR-I-90 and your response to MPA/USPS-T25-3(b), where you state: "It is my understanding that USPS Operations considers the throughput of an FSM 881 in BCR/OCR mode processing barcoded flats to be the same as an FSM 881 in BCR/OCR (sic) mode processing barcoded flats." Please refer to LR-I-90. In particular, refer to Worksheet "Scenario Costs" and the tables titled "Standard (A) Regular Cost Averages - Actual" and "Standard (A) Regular Cost Averages - Normalized Auto-Related Cost Savings" on Worksheet "Cost Averaging."

(a) How many addresses can a BCR read per hour? If different BCRs have different maximum read rates, please provide the maximum read rate for each and provide a description of each BCR.

(b) How many addresses can an OCR read per hour? If different OCRs have different maximum read rates, please provide the maximum read rate for each and provide a description of each BCR.

(c) Please describe the mail flow for a piece that is rejected from an FSM. In doing this, please describe the mail flow in terms of both mail sorting activities and allied activities.

(d) Please explain which of these activities must be performed for flats that are not rejected.

(e) For each activity that must be performed for rejected mail, but need not be performed for mail that is not rejected, please indicate whether LR-I-90 models it.

(f) For each activity identified in part (e), please provide productivity and per-piece cost figures for performing the activity.

(g) What is the maximum throughput for an AFSM 100

(h) What is the maximum throughput for an FSM 881 with automatic feeders?

(i) What is the maximum throughput for an FSM 1000 with automatic feeders?

PostCom/USPS-T-25-5. Please refer to page 18-19 of Lr-I-126, where it states, **"IMPROVE FLAT SORTER MACHINE (FSM) UTILIZATION** — This program is a local management initiative to maximize the use of the flat sorting machines through management focus and best practices" and LR-I-90.

(a) Does your flats cost model reflect the increased utilization of FSMs described in LR-I-126?

(b) If not, please quantify how the increased utilization of FSMs would affect the value of automation.

DC1/111719

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

Ian D. Volner
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