

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

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POSTAL RATE COMMISSION
DEPT OF THE POSTAL SERVICE

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS YACOBUCCI
(PostCom/USPS-T-25-6-8)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Yacobucci: PostCom/USPS-T-25-6-8. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/USPS-T-25-6. Please refer to witness Kingsley's response to Postcom/USPS-T10-2, which states, "Barcoded sack labels, which allow more efficient sack handling, are required for flat automation mailings in sacks."

(a) Please provide the productivity for handling sacks that have barcoded sack labels.

(b) Please provide the productivity for handling sacks that do not have barcoded sack labels.

(c) Please quantify the impact of the more efficient handling of sacks with barcoded sack labels on the automation cost differential for Standard (A) Regular 3/5-digit flats. Please provide all underlying calculations in an electronic spreadsheet.

(d) Please quantify the impact of the more efficient handling of sacks with barcoded sack labels on the automation cost differential for Standard (A) Regular Basic flats. Please provide all underlying calculations in an electronic spreadsheet.

PostCom/USPS-T-25-7 Please refer to witness Kingsley's response to Postcom/USPS-T10-2(a), which states: "Yes, I am told that any differences in address quality, to the extent that they have an effect on costs, would be among the factors that cause automation and non-automation mail to have different accept rates with subsequent processing of rejects in operations with lower productivity." Further, please refer to witness Kingsley's response to Postcom/USPS-T10-3(f), which states: "Assuming the Zip Code is correct, we may be unable to sort to the correct carrier, post office box, or to the correct recipient. If the mailpiece is then undeliverable as addressed, then, depending upon class, the disposition of the mailpiece incurs more costs if it must be returned to the sender."

(a) Please confirm that while the flats cost model (LR-I-90) does model some of the costs of poor address quality, it doesn't model all costs of poor address quality. If not confirmed, please explain.

(b) Please confirm that the flats cost model does not model the added cost of handling undeliverable as addressed mail. If not confirmed, please explain.

(c) Please describe all other costs of poor address quality that are not modeled in the flats cost model.

(d) Please quantify the impact of differences in address quality between non-automation flats and automation flats on the automation cost

differential for Standard (A) Regular 3/5-digit flats. Please provide all underlying calculations in an electronic spreadsheet.

(e) Please quantify the impact of differences in address quality between non-automation flats and automation flats on the automation differential for Standard (A) Regular Basic flats. Please provide all underlying calculations in an electronic spreadsheet.

PostCom/USPS-T-25-8. Please refer to LR-I-90, worksheet "Productivities."

(a) Please confirm that the flats cost model assumes that the productivity of an AFSM 100 processing barcoded flats is approximately 80 percent higher than the productivity of an AFSM 100 processing nonbarcoded flats. If not confirmed, how much higher is the AFSM 100 productivity for processing barcoded flats?


(b) Please confirm that your model assumes that the productivity of an FSM 881 processing barcoded flats is the same as its productivity for sorting nonbarcoded flats. If not confirmed, please explain.

(c) Please confirm that the source of these assumptions is USPS operations. If not confirmed, please explain.

(d) All else being equal, please confirm that if the productivity difference between processing barcoded flats and nonbarcoded flats increases, the automation cost differential should increase as well. If not confirmed, please explain.

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