

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

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(PostCom/USPS-T-10-8-9)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-10-8-9. 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-10-8.

(a) Please list and describe all of the factors that cause an automation letter to be less expensive for the Postal Service to handle than a similarly presorted non-automation letter.

(b) Individually for each factor listed in part (a), indicate whether the resulting savings are modeled in the mail processing cost model presented by witness Miller. If only a portion of the savings resulting from a particular factor are modeled by witness Miller, please explain which portion is modeled by witness Miller and which portion is not modeled by witness Miller.

(c) For each factor not modeled by witness Miller, please describe in detail why it reduces Postal Service costs. Please also quantify the savings that result from the factor.

(d) For each factor not modeled by witness Miller, please provide a copy of all studies and reports that discuss the benefits to the Postal Service of the factor.

(e) If the average wage rate for clerks that primarily handle automation letters is different than the average wage rate for clerks that primarily handle non-automation letters, please quantify the difference in average wage rate for handling automation letters and handling non-automation letters.

(f) If the container handling productivity is different for containers with automation letters and containers with non-automation letters, please provide productivities for handling containers with automation letters and containers with non-automation letters.

PostCom/USPS-T-10-9.

(a) Please confirm that there is a difference in address quality between automation letters and non-automation letters. If not confirmed, please provide your rationale.

(b) Please describe why there is a difference in address quality between automation letters and non-automation letters.

(c) Please confirm that better address quality stems directly from requirements imposed on automation mail.

(d) Please confirm that ignoring the difference in address quality between automation letters and non-automation letters understates the cost difference between automation letters and non-automation letters.

(e) Please provide copies of all Postal Service studies and reports that quantify the difference in address quality between automation letters and non-automation letters.

(f) Please describe all potential mail flows for a letter that is mailed to the wrong address. In particular, please describe the mail flows individually for the following types of address problems.

- (i) Incorrect name
- (ii) Incorrect street number
- (iii) Missing or incorrect directionals
- (iv) Incorrect apartment number
- (v) No apartment number
- (vi) Incorrect zip code

(g) For each mail flow described in part (f), please describe all incremental Postal Service handling required because the letter was addressed incorrectly.

(h) For each mail flow described in part (f), please quantify the unit cost to the Postal Service of the letter being addressed incorrectly.

(i) If the mail flows and unit costs for flats that are addressed incorrectly are different than the mail flows and unit costs for letters that are addressed incorrectly, please provide the same information for flats as you provided in parts (f)-(h) of this interrogatory for letters.

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