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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

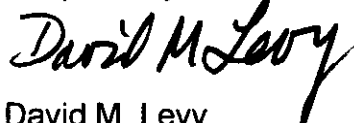
Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**THIRD INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS KINGSLEY (ANM/USPS-T10-41-45)**

Pursuant to section 20 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness Linda A. Kingsley (USPS-T-10). ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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March 16, 2000

QUESTIONS

ANM/USPS-T10-41. Please refer to your testimony about the FSM 881 at pages 10-11.

- a. In what year were the first barcode readers (“BCRs”) deployed to the FSM 881s?
- b. In what year did the Postal Service complete equipping the FSM 881s with BCRs?
- c. In what year were the first optical character readers (OCRs) deployed on the FSM 881s?

ANM/USPS-T10-42. Please refer to your response to ANM/USPS-T10-1.

- a. What was the average productivity of the FSM 775s (in terms of pieces per hour) during each year before 1990, when they began converting to FSM 881s?
- b. What was the average productivity (in terms of pieces per hour) of the FSM 881s during each year before deployment and installation of the barcode readers (“BCRs”)?
- c. What was the average productivity (in terms of pieces per hour) of the FSM 881s each year after deployment and installation of BCRs?
- d. What is the average productivity (in terms of pieces per hour) of FSMs during each year that they have been equipped with optical character readers (OCRs) and BCRs?

ANM/USPS-T10-43. What was the average productivity, in terms of pieces per hour, of the FSM 1000 (a) during each year before deployment and installation of barcode readers ("BCRs"), and (b) during each year following deployment and installation of BCRs?

ANM/USPS-T10-44. Please refer to your response to ANM/USPS-T10-20, which indicates that (i) the maximum, sustainable throughput of the FSM 881 in manual keying mode, using a full complement of six employees, is approximately 10,000 per hour, or about 1,667 pieces per workhour; and (ii) a throughput of 14,000, or about 2,333 pieces per workhour may be possible in an ideal environment. Also refer to your response to ANM/USPS-T0-16, which indicates that average productivity in AP 5 of FY 2000 was only 575.4 pieces per workhour.

a. What was the average productivity of FSM 881s when used in manual keying mode during AP 5 of FY 2000?

b. What was the average productivity of FSM 881s when used in BCR mode during AP 5 of FY 2000?

c. What was the average productivity of FSM 881s when used in OCR mode during AP 5 of FY 2000?

d. Please provide a detailed explanation why the actual productivity of FSM 881s in all modes combined was less than 35 percent ($= 1,667/575.4$) of the maximum throughput in manual keying mode.

ANM/USPS-T10-45. Please refer to your response to ANM/USPS-T0-16, which

indicates that in AP 5 of FY 2000 the average productivity of FSM 881s was only 575.4 pieces per workhour, while the average productivity of FSM 1000s was 592.4 pieces per workhour

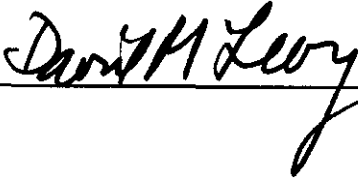
a. Confirm that in AP 5 of FY 2000 all FSM 881s were equipped with OCRs and no FSM 1000s were equipped with OCRs. If you do not confirm, please provide the number of each FSM that were equipped with OCRs.

b. Confirm that the FSM 1000s are supposed to be used for pieces that cannot be processed on the FSM 881 (e.g., flimsies, oversized or thicker pieces, certain polybagged items) and are generally considered more difficult to handle. If you do not confirm, please explain the types of mail that are being processed on the FSM 1000.

c. Please explain in detail why the productivity on the FSM 881 is lower than the productivity on the FSM 1000.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



March 16, 2000