

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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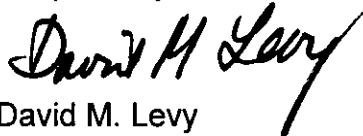
Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**FOURTH INTERROGATORIES
OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS KINGSLEY (ANM/USPS-T10-46-47)**

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 20, 2000

QUESTIONS

ANM/USPS-T10-46. Please refer to USPS-LR-I-193, Publication 128, *Strategic Improvement Guide for Flats Processing* (September 1999), at page 4.

- a. Please confirm that the productivities shown above the bars in the bar chart on that page represent pieces per hour. If you do not confirm, please explain what they mean.
- b. What are the meanings of "140c" and "960c" that appear in the small box?
- c. For each pair of bars shown for each fiscal year, what do the bars on the left and the right represent?
- d. The right-hand bars show the following productivities:

FY 94	1520
FY 95	1450
FY 96	1332
FY 97	1165
A/POI-FY 98	845

Most alarmingly, not only has year-to-year productivity been declining, but also at an accelerating rate, as follows:

FY 94-95	70 pcs/hr
FY 95-96	118 pcs/hr
FY 96-97	167 pcs/hr
FY 97-98	320 pcs/hr

In light of these data, has the declining trend in flat sorting productivity been projected in the roll-forward model to TY 2001? If not, for TY 2001 what underlying assumptions were used for flat sorting productivity and cost, and what was the basis for extrapolating or not extrapolating the downward trend in productivity?

ANM/USPS-T10-47. Now that all FSM 881s are equipped with BCRs and OCRs, why is flat sorting productivity on FSMs lower than in earlier years when all or most flats were keyed manually? Please produce (or cite, if already produced) documents sufficient to verify your response.

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 20, 2000