

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

**NEWSPAPER ASSOCIATION OF AMERICA
SECOND SET OF INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
LINDA A. KINGSLEY (NAA/USPS-T10-19-22)
March 21, 2000**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Linda A. Kingsley (NAA/USPS-T10-19-22) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

March 21, 2000

William B. Baker
William B. Baker

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NAA/USPS-T10-19. Has the deployment and use of vertical flats cases had any discernible effect on city carrier street time? If so, please describe how city carrier street time activities have been affected by vertical flats casing.

NAA/USPS-T10-20. What percentage of delivery points do cluster boxes serve? If you do not have specific data, please provide your best estimate of the penetration of cluster boxes compared with 1985.

NAA/USPS-T10-21. Please consider two sets of twenty-four delivery points, each served by park and loop routes. Set (A) is served by a single cluster box; the other (Set B) consists of twenty-four distinct single family dwellings.

- a. Do you agree that access time for serving those delivery points is likely to be less on Set A than Set B?
- b. Is there any reason why coverage related load time would differ between Set A and Set B?
- c. Is there any reason why elemental load time would differ between Set A and Set B, assuming the same number and mix of mail is delivered on both routes?

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NAA/USPS-T10-22. Please confirm the following that it is possible that Delivery Point Sequencing equipment can sort barcoded mail incorrectly.

- a. Does the Postal Service have data regarding the frequency of missortations by DPS equipment (that is, mail is sorted into the incorrect bin so that it is placed out of sequence)? If so, please provide the missort error rate.
- b. Please confirm that a city carrier will in-office typically will not verify the sequence accuracy of DPS-sequenced mail. If you cannot confirm, please explain why not.
- c. Please confirm that when mail is incorrectly sequenced, carriers (city and rural) will spend more time at the delivery point due to the need to verify the address or to identify and pull an incorrectly-sequenced piece.
- d. Would time devoted by a city carrier to handling a mis-sequenced piece at the delivery point be categorized as elemental load time, coverage-related load time, or some other category.