

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS YACOBUCCI TO INTERROGATORIES OF ASSOCIATION FOR
POSTAL COMMERCE
(PostCom/USPS-T25—4(e-f) & 5)**

The United States Postal Service hereby provides the responses of witness Yacobucci to the following interrogatories of the Association for Postal Commerce: PostCom/USPS-T25—4(e-f) & 5, filed on March 8, 2000. Subparts (a) through (d) and (g) through (i) of interrogatory PostCom/USPS-T25—4 are redirected to witness Kingsley.


Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking


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March 22, 2000

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PostCom/USPS-T25-4. Please refer to LR-I-90 and your response to MPA/USPS-T25-3(b), where you state: "It is my understanding that USPS Operations considers the throughput of an FSM 881 in BCR/OCR mode processing barcoded flats to be the same as an FSM 881 in BCR/OCR (sic) mode processing barcoded flats." Please refer to LR-I-90. In particular, refer to Worksheet "Scenario Costs" and the tables titled "Standard (A) Regular Cost Averages - Actual" and "Standard (A) Regular Cost Averages - Normalized Auto-Related Cost Savings" on Worksheet "Cost Averaging."

(a) How many addresses can a BCR read per hour? If different BCRs have different maximum read rates, please provide the maximum read rate for each and provide a description of each BCR.

(b) How many addresses can an OCR read per hour? If different OCRs have different maximum read rates, please provide the maximum read rate for each and provide a description of each BCR.

(c) Please describe the mail flow for a piece that is rejected from an FSM. In doing this, please describe the mail flow in terms of both mail sorting activities and allied activities.

(d) Please explain which of these activities must be performed for flats that are not rejected.

(e) For each activity that must be performed for rejected mail, but need not be performed for mail that is not rejected, please indicate whether LR-I-90 models it.

(f) For each activity identified in part (e), please provide productivity and per-piece cost figures for performing the activity.

(g) What is the maximum throughput for an AFSM 100

(h) What is the maximum throughput for an FSM 881 with automatic feeders?

(i) What is the maximum throughput for an FSM 1000 with automatic feeders?

RESPONSE:

a. - d. Redirected to witness Kingsley.

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- e. Though USPS LR-I-90 does not explicitly decompose every imaginable mail processing activity, it does adjust modeled unit costs using CRA costs that comprise *all* flats mail processing costs. Hence, the model takes into account any mail processing costs caused by both accepted and rejected flats.

Further, USPS LR-I-90 explicitly models the mailflow of rejected flats. Please refer to USPS-T-25, pages 18-19 and 23-24, for discussions on accept rates and reject flows and to USPS LR-I-90 for modeled mailflows and accept rates.

- f. Please refer to the worksheets entitled '*Mailflow Model Costs*' and '*Productivities*' in USPS LR-I-90 for unit cost figures and productivities for specific activities.
- g. - i. Redirected to witness Kingsley.

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PostCom/USPS-T25-5. Please refer to page 18-19 of Lr-I-126, where it states, "**IMPROVE FLAT SORTER MACHINE (FSM) UTILIZATION** — This program is a local management initiative to maximize the use of the flat sorting machines through management focus and best practices" and LR-I-90.

(a) Does your flats cost model reflect the increased utilization of FSMs described in LR-I-126?

(b) If not, please quantify how the increased utilization of FSMs would affect the value of automation.

RESPONSE:

a. It is my understanding that it does.

b. Not applicable.

DECLARATION

I, David Yacobucci, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

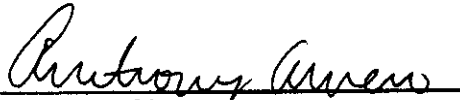
David Yacobucci

DAVID YACOBUCCI

Dated: 3/22/00

CERTIFICATE OF SERVICE

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


Anthony Alverno

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