



BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL W. MILLER
(DFC/USPS-T24-1-7)

March 20, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Michael W. Miller.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

Respectfully submitted,

Dated: March 20, 2000

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

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

DOUGLAS F. CARLSON

March 20, 2000
Emeryville, California

DFC/USPS-T24-1. Please refer to your testimony at page 14, lines 6–7. Please explain why stamped cards might be an appropriate benchmark for calculating card worksharing discounts.

DFC/USPS-T24-2. Would you expect costs for stamped cards to be higher or lower than the costs for single-piece post cards that are not stamped cards? Please explain.

DFC/USPS-T24-3. Would you expect costs for stamped cards to be higher or lower than total costs for single-piece post cards (including stamped cards)? Please explain.

DFC/USPS-T24-4. Please discuss the difference between operation 884, incoming SCF, and operation 885, incoming primary. If possible, please select a P&DC and provide an example (not necessarily based on the facility's actual sort plans) that would explain the difference between these sort plans.

DFC/USPS-T24-5. Please provide the operation number used for programs to sort outgoing FIM mail.

DFC/USPS-T24-6. Does Postal Service headquarters request or require P&DC's to provide holdouts on their BCS machines for FIM mail destined to certain large-volume recipients? Please discuss and provide the number of such recipients, if available.

DFC/USPS-T24-7. Please discuss the extent to which P&DC's use DBCS machines, rather than MPBCS machines, for outgoing FIM programs and outgoing secondary (872) programs.