

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
MAR 23 3 48 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

SECOND INSTITUTIONAL INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS
(PostCom/USPS-5-8)

Pursuant to Sections 25 and 26 of the rules of practice, the Association
for Postal Commerce submits Institutional Interrogatories to the USPS:
(PostCom/USPS-5-8).

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

March 23, 2000

PostCom/USPS-5. Please refer to the first paragraph of Page 1 of the USPS Address Deficiency Study (LR-I-192), which states, "The Address Deficiency Study was conducted as part of the broader USPS Undeliverable as Addressed (UAA) mail cost study...This effort updated the 1993 Operation Mail study used to identify the magnitude of issues related to address hygiene and to recommend and implement means of improving address accuracy."

(a) Please file as library references copies of all reports of studies that were conducted as part of the broader USPS Undeliverable as Addressed (UAA) mail cost study.

(b) Please file as a library reference a copy of the report of the 1993 Operation Mail study.

(c) Please list all data sets that were collected as part of the USPS Undeliverable as Addressed (UAA) mail cost study.

(i) For each data set, please describe the contents of the data set.

(ii) For each data set, please provide a complete data dictionary.

(iii) For each data set, please indicate the data format.

(iv) Please provide an electronic copy of each data set.

PostCom/USPS-6. Please refer to Figure 1 on Page 7 of LR-I-192.

(a) Please complete a table equivalent to Figure 1 using only data for Standard (A) prebarcoded letters.

(b) Please complete a table equivalent to Figure 1 using only data for Standard (A) letters that are not prebarcoded.

(c) If data are available, please complete a table equivalent to Figure 1 using only data for Standard (A) prebarcoded non-letters.

(d) If data are available, please complete a table equivalent to Figure 1 using only data for Standard (A) non-letters that are not prebarcoded.

(e) If data are available, please complete a table equivalent to Figure 1 using only data for prebarcoded Periodicals mail.

(f) If data are available, please complete a table equivalent to Figure 1 using only data for Periodicals mail that is not prebarcoded.

(g) Individually for each deficiency type listed in Figure 1, please describe the additional USPS activities that are required due to the presence of the deficiency.

PostCom/USPS-7. Please refer to the table in Appendix C on Page 15 of LR-I-192.

(a) Please complete a table equivalent to Appendix C using only data for Standard (A) prebarcoded letters.

(b) Please complete a table equivalent to Appendix C using only data for Standard (A) letters that are not prebarcoded.

(c) If data are available, please complete a table equivalent to Appendix C using only data for Standard (A) prebarcoded non-letters.

(d) If data are available, please complete a table equivalent to Appendix C using only data for Standard (A) non-letters that are not prebarcoded.

(e) If data are available, please complete a table equivalent to Appendix C using only data for prebarcoded Periodicals mail.

(f) If data are available, please complete a table equivalent to Appendix C using only data for Periodicals mail that is not prebarcoded.

PostCom/USPS-8. Please refer to Page 2 of LR-I-192, where it states, "As the Postal Service continues to expand its use of automated mail processing equipment, there are considerable cost savings due to the reduction in human handling of mail. However, in cases where automated equipment cannot process a mail piece due to significant address deficiencies, the full potential of cost savings due to automation cannot be realized. Because manual handling of mail is much more costly than automated processing, it is important to limit the extent of addressing deficiencies. Doing so may reduce overall mail processing costs significantly."

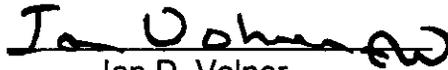
(a) Please estimate the additional cost to the Postal Service caused by address deficiencies. Please describe the methods you used to develop the estimate and provide all underlying calculations in an electronic spreadsheet format.

(b) Please disaggregate the cost provided in part (a) of this interrogatory by class, subclass, shape, and rate category. If the total cost cannot be disaggregated to this level of detail, please disaggregate the total cost to the extent possible.

Dc1/112535

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


Ian D. Volner