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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 LINDA A. KINGSLEY
(DFC/USPS-T10-11-27)

March 16, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Linda A. Kingsley.

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 16, 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 16, 2000
Emeryville, California

DFC/USPS-T10-11. Suppose a large company receives mail at the following two addresses, both of which are assumed to be valid and correct for this interrogatory:

PO BOX 1000
NEW YORK NY 10001-1000

PO BOX 2000
LOS ANGELES CA 90001-2000

Suppose, further, that this recipient provides customers with pre-addressed courtesy-reply envelopes printed with FIM "A". A delivery-point bar code appears in the address block. Now, please consider two scenarios.

Scenario 1: The envelopes contain an address-block bar code corresponding to 10001-1000, but the envelopes are addressed as follows:

PO BOX 1000
LOS ANGELES CA 10001-1000

Scenario 2: The envelopes contain an address-block bar code corresponding to 10001-1000, but the envelopes are addressed as follows:

PO BOX 2000
LOS ANGELES CA 90001-2000

- a. Assuming that the mailer can receive mail at either of the two correct addresses listed at the beginning of this interrogatory, please confirm that, in both scenarios, letters that are sorted entirely on automation may be delivered to the address corresponding to the delivery-point bar code, 10001-1000, without delay and without additional costs to the Postal Service.
- b. Please confirm that some letters receive outgoing primary sortation in a manual operation because one of the following three situations exists: (1) Automated sorting equipment does not exist at the originating facility; (2) The letters rejected from automated sorting equipment; (3) The letters were damaged in processing, preventing further automated processing.
- c. Please confirm that some letters destined for addresses in New York and Los Angeles receive incoming sortation in a manual operation because the letters rejected from automated sorting equipment or because the letters were damaged in processing, preventing further automated processing.
- d. In scenario 1, please confirm that a letter sorted by an outgoing manual operation may be sorted to either New York or Los Angeles, depending on whether the clerk sorts the letter based on the city or the ZIP Code.
- e. In scenario 1, please confirm that a letter sorted by an outgoing manual operation to Los Angeles might be placed on automated sorting equipment upon arrival in Los Angeles.
- f. In (e), please confirm that the automated sorting equipment in Los Angeles may redirect the letter back to New York based on the preprinted bar code, causing a delay and additional processing cost.

- g. In scenario 1, please confirm that even letters sorted in automated operations may be delayed if an employee notices the discrepancy between the city and the ZIP Code and redirects the letter based on either the city or the ZIP Code. If you confirm, might this mail even become loop mail?
- h. In scenario 2, please confirm that a clerk in a manual operation in the originating city would sort the letter to Los Angeles.
- i. In (h), please confirm that the letter may be placed on automated sorting equipment upon arrival in Los Angeles, and automated sorting equipment in Los Angeles may direct the letter to New York based on the preprinted bar code, causing a delay and additional processing costs.
- j. In (h), please confirm that some letters sorted on automated equipment in the originating facility may be directed to New York based on the preprinted bar code, only to be redirected back to Los Angeles in a manual operation in New York if a clerk notices that the letters have a Los Angeles address.
- k. In general, would you expect scenarios 1 and 2 to cause some delay in delivery of these letters and some increase in postal processing costs?

DFC/USPS-T10-12. Please refer to your response to DFC/USPS-T10-2(a). Please explain why images processed through the OCR/ISS and RCR have a higher encode rate than images lifted on the AFCS/ISS with just the RCR. In your answer, please explain the difference in character-recognition technology and capability between the OCR and the RCR.

DFC/USPS-T10-13. Please provide a copy of documents supporting the policy described in your response to DFC/USPS-T10-2(b).

DFC/USPS-T10-14. Please refer to your response to DFC/USPS-T10-2(d).

- a. Please explain the timetable for adding an OCR to the AFCS and provide documents explaining the reasons for this modification.
- b. If an OCR were added to the AFCS, would the OCR stackers be attached to the AFCS?

DFC/USPS-T10-15. Do any Low-Cost MLOCR's have ISS or OSS? If yes, please explain and provide the locations.

DFC/USPS-T10-16. Please refer to the attachment to DFC/USPS-T10-6(a).

- a. Please explain the meaning of the "1" next to some city names.
- b. Please explain the meaning of boldface city names.
- c. For the "Master REC Closing Synopsis," please provide a version that indicates which plants have moved (the footnote indicates that this information was in red in the original, but the copy is in black and white).

DFC/USPS-T10-17.

- a. Please confirm that the fluorescent RBCS ID tag contains four digits that correspond to the AFCS or OCR machine number.
- b. Please confirm that two of the four digits in the RBCS ID tag are a number that corresponds to the performance cluster in which the machine is located.
- c. Please provide a list indicating the number of each performance cluster for purposes of machine numbers in RBCS ID tags. (For example, machines in the Oakland performance cluster use performance cluster number "05.")
- d. Please provide any documents that explain how to read or decode RBCS ID tags or explain the concept underlying derivation of the bar code. (For example, Postnet bar codes are binary codes using the 74210 sequence.)

DFC/USPS-T10-18.

- a. Please confirm that CSBCS machines require three passes to place mail in walk-sequence order.
- b. Please explain the type and level of sortation that is performed on each of the three passes.

DFC/USPS-T10-19. Please refer to your response to DFC/USPS-T10-8(d). Are certified flats sorted to a separate holdout during outgoing primary sortation, too?

DFC/USPS-T10-20. Please refer to your response to DFC/USPS-T10-8.

- a. Please confirm that Postal Service stamped cards typically do not need to go to an LMLM machine to prepare the card surface for application of an RBCS ID tag. If you do not confirm, please explain.
- b. Please confirm that glossy post cards often need to go to an LMLM machine to prepare the card surface for application of an RBCS ID tag. If you do not confirm, please explain.

DFC/USPS-T10-21. Please refer to your response to DFC/USPS-T10-9(f). Please note that the question did not specify that the letters were stale-dated. Therefore, please provide a response to the original question with the understanding that the metered letters may either be correctly dated or stale-dated.

DFC/USPS-T10-22. Please provide a list of facilities that have the TMS.

DFC/USPS-T10-23. Please provide a list of offices using the ES-3 bar-coding platform.

DFC/USPS-T10-24. Please describe plans to deploy the "integrated buffer system."

DFC/USPS-T10-25. Please discuss the plans for adding ISS to Low-Cost MLOCR's at sites that currently do not have RBCS.

DFC/USPS-T10-26. Please refer to p. 10 of the response to POSTCOM/USPS-T10-4(a). Please describe the type and location of the facility listed as "Totowa (Annex)."

DFC/USPS-T10-27. Please define "managed mail."