

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 KINGSLEY TO INTERROGATORIES OF  
THE NEWSPAPER ASSOCIATION OF AMERICA  
(NAA/USPS-T10-19, 20, and 22(a)-(c))

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of the Newspaper Association of America: NAA/USPS-T10-19, 20, and 22(a)-(c), filed on March 21, 2000. Interrogatories NAA/USPS-T10-21 and 22(d) were redirected to witness Baron.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

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April 4, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA**

**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.

**Response:**

I am not aware of and would not expect any such effect.

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**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.

**Response:**

I am told that as of March 11, 2000, data from the Address Management System indicates that 8.7% of delivery points are served by cluster boxes.

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**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?

**Response:**

Redirected to USPS witness Baron.

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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.

**Response:**

a. I am told that this data is not available at the national level.

b. Confirmed. City carriers are required to take DPS mail directly to the street once the DPS sort accuracy exceeds 98% for three consecutive days.

c. Not confirmed. City carriers "finger" the mail as they approach the delivery point. This method would not differ between pieces incorrectly sequenced due to DPS or due to a manual sort error. Rural carriers have the option to case DPS mail and, I am told, generally exercise that option.

d. Redirected to USPS witness Baron.

DECLARATION

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

Linda A. Kingsley  
Date: 4-4-2000

## 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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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