

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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OFFICE OF THE SECRETARY**

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES
TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY
(DFC/USPS-T10-28-34)**

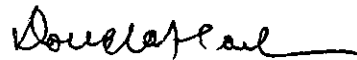
April 8, 2000

Pursuant to Rules 25-27, I hereby submit follow-up interrogatories to United States Postal Service witness Linda A. Kingsley. Interrogatories 28 and 29 follow up on the response to OCA/USPS-T10-2(b), which I received on April 4, 2000. Interrogatories 30-34 follow up on DFC/USPS-T10-23, to which the Postal Service objected on April 6, 2000.

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: April 8, 2000



DOUGLAS F. CARLSON

DFC/USPS-T10-28. Please refer to the response to OCA/USPS-T10-2(b).

- a. For Sundays, please provide the actual numbers you used to calculate the percentages for each of the six facilities.
- b. Please provide the dates of the Sundays during FY 1999 on which each of the six facilities processed mail through the AFCS.

DFC/USPS-T10-29. Please refer to the response to OCA/USPS-T10-2(b). Are AFCS volume totals available for each P&DC and P&DF in the country for each day in FY 1999 on which the facility processed mail through an AFCS? Do the totals exist in a PC-based computer system? Please explain.

DFC/USPS-T10-30. Please provide the number of postal facilities that use the ES-3 bar-coding platform.

DFC/USPS-T10-31. Please describe the role of the ES-3 bar-coding platform in the Postal Service's automation program.

DFC/USPS-T10-32. Are the ES-3 bar-coding platforms used only in offices that do not have RBCS? If the answer is no, please explain.

DFC/USPS-T10-33. Please explain why you did not discuss the ES-3 bar-coding platforms in your testimony.

DFC/USPS-T10-34. Please confirm that cost-avoidance models that use bar-coding via RBCS as a baseline may not be accurate to the extent that the models do not consider costs associated with bar-coding mail using ES-3 bar-coding platforms.

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

April 8, 2000
Emeryville, California