

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

INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS UNGAR  
(PostCom/USPS-ST-43-1-6)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Ungar: PostCom/USPS-ST-43-1-6. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

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

PostCom/USPS-ST-43-1. You say (at page 4 of USPS-ST-43) that "Some mailings in other [than Periodical] classes arrive in a line-of-travel sequence . . . ." Please identify those other classes.

PostCom/USPS-ST-43-2. You note (at page 4 of your testimony) that "Mail of all classes frequently arrives in pallets and sacks. Pallets are generally the easier to handle . . . ." You discuss the cost of breakage of periodical bundles and recite that you " . . . understand that recently measures have been initiated to minimize mail processing bundle breakage."

(a) Do these measures have to do only with bundles of Periodicals? If not, to what non-Periodical mail do they apply.

(b) Do you have any information concerning the anticipated success of these "measures"? If so, what is it?

PostCom/USPS-ST-43-3. Witness O'Tormey attributes to you the conclusion that " . . . the Postal Service had difficulty reducing the number of employees [hired in the fall of 1998]." Is this an accurate characterization of your testimony?

PostCom/USPS-ST-43-4. Do you have a view as to whether commercial Standard A regular automation mail is presented on pallets more frequently than Commercial Standard A presort mail? If so what is it?

PostCom/USPS-ST-43-5. In the text at lines 1-12 at page 15 of your testimony you describe the complexity of evaluating performance but make no ultimate evaluation. If you have evaluated performance in the Southeast Area, what is that evaluation?

PostCom/USPS-ST-43-6. Page 2 of your testimony says: "My testimony addresses three specific issues: (1) the trend in Periodicals since 1993; (2) the trend in flats mail costs in FY 1998; and (3) the trend in flats productivity from 1995 to 1999." LR-I-107 provides productivities for FY 1998 for MODS operations. Please provide three updates to LR-I-107, Yrscrub.xls, worksheet "table" using data from the following periods: (1) FY 1999; (2) FY 1999, AP13; and (3) FY 2000, YTD. Please also answer the following questions about how MODS reports data for FSM 881s with both OCR and BCR capability and about the Baltimore AFSM 100 trial.

(a) How are TPH, TPF, and workhours for an FSM 881 with both BCR and OCR capability reported in the updated tables?

(b) How are TPH, TPF, and workhours for an FSM 881 with both BCR and OCR capability reported in MODS?

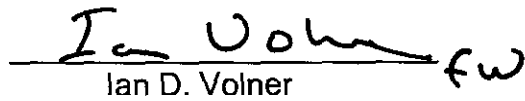
(c) What MODS numbers can be used to record TPH, TPF, and workhours for FSM 881s with both BCR and OCR capability?

(d) Are TPH and TPF for barcoded flats that are processed on an FSM 881 with both BCR and OCR capability reported in different MODS numbers than are TPH and TPF for nonbarcoded flats that are processed on the same machine?

(e) Please provide TPH and TPF data for the AFSM 100 trial in Baltimore. In particular, please provide aggregate AFSM 100 TPH and TPF, AFSM 100 TPH and TPF just for barcoded flats, and AFSM 100 TPH and TPF just for nonbarcoded flats.

## 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.

A handwritten signature in black ink, appearing to read "Ian D. Volner", is written over a horizontal line. To the right of the signature, the letters "fw" are handwritten.

Ian D. Volner