

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

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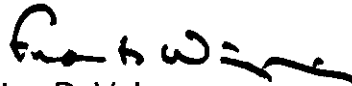
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS O'TORMEY  
(PostCom/USPS-ST-42-1-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness O'Tormey: PostCom/USPS-ST-42-1-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Counsel for Association for Postal Commerce

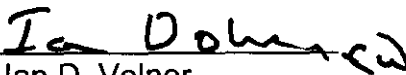
PostCom/USPS-ST-42-1. Please refer to Page 21 of the "Strategic Improvement Guide for Flats Processing" (LR-I-193) where it states, "Ideally, all FSM 881 machineable flats should be processed on the FMOCR. However, depending on the mailbase being processed, the reality is that only 70% to 80% of the non-barcode flats inducted will be read by the FMOCR, which means that 20% to 30% of the flats inducted will not be read by the FMOCR." Please confirm that this FMOCR read rate for non-barcode, machineable flats is consistent with your experience. If confirmed provide any data of which you are aware supporting this conclusion. If not confirmed, please explain fully.

PostCom/USPS-ST-42-2. Has the deployment of FMOCRs that you discuss at page 9 of your testimony increase the productivity of FSM 881?

DC1/1113962

## 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.

  
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Ian D. Volner