

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
DOUGLAS F. CARLSON
(DFC/USPS-T10-31, 33, and 34)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Douglas F. Carlson: DFC/USPS-T10-31, 33, and 34, filed on April 10, 2000. Objections to interrogatories DFC/USPS-T10-28-30 and 32 were filed on April 20, 2000.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

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

Response:

The ES-3 bar coding platforms were purchased and deployed by the field as "local management [cost-savings] initiatives". Therefore, headquarters does not have a listing of exactly what offices have been provided with the systems. We do however, understand the operational concept by which they were justified. The intent was to provide smaller non-RBCS offices with additional bar coding capability, similar to the RBCS. The basis for the savings was the reduction in manual letter volumes.

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

Response:

The ES-3 bar-coding platform is not a program supported by Headquarters, and would only affect a very small portion of letter volume, so I did not believe it had any relevance in my testimony.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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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.

Response:

[It is assumed that this question refers to the cost models included in the testimony of witness Miller (USPS-T-24). It should be noted that the RBCS operations in those models would only have an impact on the nonautomation presort rate categories.]

Not confirmed. It is my understanding that the cost models do not include cost estimates for the ES-3 barcoding platforms. However, the cost model results (when relied upon) are tied back to the CRA. The costs related to ES-3 barcoding platforms should be imbedded in the CRA mail processing unit costs to the extent that these systems are used in the field. Therefore, any costs related to ES-3 barcoding platforms that do affect the total mail processing unit cost estimates and worksharing related savings estimates are reflected in his analysis.

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: 7-24-2000

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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