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

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POSTAL RATE BENNEL HON OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS WALTER F. O'TORMEY (NAA/USPS-ST42-1) April 26, 2000

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Walter F. O'Tormey (NAA/USPS-ST42-1) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

William B. Baker
E. Joseph Knoll III
Isaac R. Campbell
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304

(202) 719-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

April 26, 2000

William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS WALTER F. O'TORMEY (NAA/USPS-ST42-1)

NAA/USPS-T42-1: For years the newspaper industry has used machines that employ rubber tipped "grabbers" to pick freshly printed newspapers from printing presses—at throughputs of up to 50,000 per hour--and move them to appropriate places in the newspaper facility, including to mailrooms. This technology is fundamentally different from that of the Postal Service. In particular, it involves "grabbing" a product instead of moving the product with belts.

Has the Postal Service ever investigated the possibility of adopting such a technology to the sortation process? Is so, please describe the conclusions the Postal Service reached. If not, please explain why not.