

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

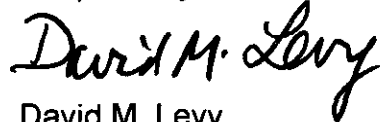
Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**SECOND INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS O'TORMEY (ANM/USPS-ST42-11-13)**

The Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness Walter F. O'Tormey (USPS-ST-42). *ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).*

Respectfully submitted,



David M. Levy
Christopher T. Shenk
Sidley & Austin
1722 Eye Street, N.W.
Washington, DC 20006-3704
(202) 736-8214

Counsel for Alliance of Nonprofit Mailers

April 26, 2000

QUESTIONS

ANM/USPS-ST42-11. In your testimony on page 13, lines 9 through 13, you discuss the issue of decisions undertaken by managers that "incur cost to avoid missorting mail, which can result in delay". Also, on page 18, lines 6 through 8, you address the issue of USPS' difficulty in reducing the number of employees during the fall 1998 mailing season. For the period from 1989 through 1999, please provide annual volume, work hour and productivity data for

- a. Flats sorted using automated (BCR/OCR) equipment.
- b. Flats sorted using higher level employee keying input.
- c. Flats sorted manually.

ANM/USPS-ST42-12. What policy guidance has Postal Service management provided to employees in the field to help them make tradeoffs between (1) using less efficient higher cost methods for sorting flats (e.g., manual sorting) and (2) using the most fully mechanized and automated equipment resources? Please produce copies of all guidelines, memoranda, and other documents setting forth or reflecting such policy guidance.

ANM/USPS-ST42-13. Does the Postal Service record the volume of mail received that is compatible with mechanized or automated flat sorting equipment?

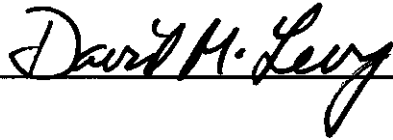
- a. If so, what amount and percentage of such mail is actually processed using mechanized or automated equipment?
- b. For the period 1989 through 1999, please provide annual data showing the total amount of machine-compatible flat mail that was diverted to less efficient sorting methods because flat volumes exceeded the capacity of mechanized or

automated flat sorting capacity.

c. Please produce (or cite, if publicly available) documents sufficient to verify your responses to parts a and b.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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April 26, 2000