

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

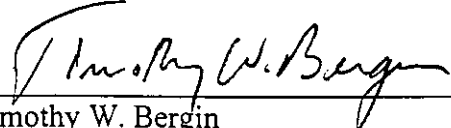
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**FOLLOW-UP INTERROGATORIES OF
THE McGRAW-HILL COMPANIES, INC. TO
USPS WITNESS KINGSLEY (MH/USPS-T10-23-30)
(May 5, 2000)**

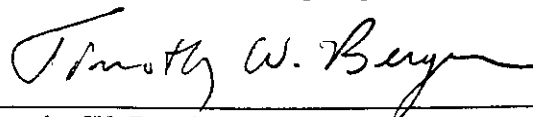
Pursuant to the Commission's rules of practice, sections 26-28, The McGraw-Hill Companies, Inc. directs the following interrogatories and other discovery requests to United States Postal Service witness Linda A. Kingsley (USPS-T-10). To the extent, if any, that witness Kingsley is unable to respond fully, please redirect these interrogatories to the person(s) best able to do so.


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CERTIFICATE OF SERVICE

I hereby certify that I have on this 5th day of May 2000 served the foregoing document in accordance with section 12 of the rules of practice.


Timothy W. Bergin

MH/USPS-T10-23: With reference to your response to MH/USPS-T10-12(f):

(a) Please describe fully each of the "seven other 'indicators'" designed to "focus the field to improve productivity," state when each of those indicators was first utilized for that purpose, and provide any and all reports tracking such indicators in FY 1999 and/or FY 2000.

(b) Please provide a copy of all "instructions to the field re-stating national policies concerning FSM utilization, maximizing automation processing, and the proper staffing for all FSM operations" (USPS-ST-42, p. 20), issued in FY 1999 and/or FY 2000.

MH/USPS-T10-24: With reference to your response to MH/USPS-T10-13(b), attributing the decline in productivity in automation flats processing to (among other things) increased BCR usage on FSM 881s, and reclassification changes related to the separation of barcoded and non-barcoded flats:

(a) Has the rate of rejects in FSM/BCR operations increased over time? If so, please produce substantiating data. If not, please explain how increased BCR usage has contributed to the accelerating trend (from 1994 through 2000) of declining productivity in automation flats processing.

(b) Please explain how the separation of barcoded and non-barcoded flats by mailers has contributed to accelerating trend of declining productivity in automation flats processing.

MH/USPS-T10-25: With reference to your response to MH/USPS-T10-13(d), please provide the average productivity (PPH) of the FSM 1000 for AP 5/FY 00, in keying mode and in BCR mode, respectively.

MH/USPS-T10-26: In response to MH/USPS-T10-13(c), and in response to MH/USPS-T10-16, you referred to your response to ANM/USPS-T10-33, which consists of a chart showing the percentages over time of flats that were handled manually, but excluding incoming secondary volumes, which were handled manually to a significantly greater extent.

(a) Please produce a version of that chart which reflects incoming secondary processing both in plants and in delivery units.

(b) Please explain fully how the Postal Service keeps track of and counts over time the number of flat mail pieces that are handled manually, and the number of flat mail pieces that are handled in mechanized or automated processing operations.

MH/USPS-T10-27: In response to MH/USPS-T10-14(b) ("Do you believe that the decline in FSM 881 productivity may reflect an increased focus on service for Standard A mail, as indicated in the response of witness Smith to DMA/USPS-T21-2(e)? Please explain your answer fully"), you responded that witness Smith, in his referenced interrogatory answer, "did not link FSM 881 productivity and service." However, witness Smith in fact stated in response to DMA/USPS-T21-2(e): "I am told that the decline in FSM 881 productivity may reflect the increased focus on service." See also response to DMA/USPS-T21-2(c) (increase in Standard A

processing costs reflects, among other things, "the decline in FSM 881 productivity [which, in part] is likely a result of the increased focus on providing service"). Accordingly, please provide a responsive answer to MH/USPS-T10-14(b).

MH/USPS-T10-28: With reference to your response to MH/USPS-T10-15, concluding that according to LR-I-87 data, 29.31 percent of Periodicals Regular, Science of Agriculture, and Nonprofit is barcoded, machinable, and non-carrier route, please either confirm the following calculations based on LR-I-87, Tables 6 and 7, or explain why you cannot confirm:

(a) Total volume of Periodicals Regular, Science of Agriculture, and Nonprofit flats reflected in Tables 6 and 7 is approximately 9.331 billion pieces.

(b) Of that volume, the total of barcoded, machinable, non-carrier route pieces is approximately 3.196 billion pieces.

(c) Those barcoded, machinable, non-carrier route pieces comprise approximately 34.3 percent of the total volume reflected in Table 6 and 7.

(d) To the extent that you do not confirm in response to subparts (a)-(c) above, please provide the calculations underlying the 29.31 percentage figure provided by you.

(e) Please explain fully the basis on which you conclude that USPS LR-I-87 is based on FY 1999 data, rather than FY 1998 data, and provide supporting references from USPS LR-I-87.

(f) Please confirm that the term "machinable", as used in LR-I-87 (and as indicated on p. 118 thereof), includes mail that can be processed only on the FSM 1000 as well as mail that can be processed only on FSM 881. If you do not confirm, please explain fully.

MH/USPS-T10-29: Please produce the February 2000 survey of Area Managers of In-Plant Support referred to in your response to MH/USPS-T10-17, along with any and all other written materials relied upon in formulating your responses to MH/USPS-T10-7 and/or MH/USPS-T10-17, or relevant thereto.

MH/USPS-T10-30: With reference to your responses to MH/USPS-T10-18 and MH/USPS-T10-19, please produce a copy of the Strategic Improvement Guide for Flats Processing (Pub. 128) as it was originally issued in March 1998, before it was updated and reissued in September 1999 (as noted in USPS-ST-42, p. 19).