

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

RECEIVED

MAY 8 4 35 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS O'TORMEY  
TO INTERROGATORY OF  
THE NEWSPAPER ASSOCIATION OF AMERICA  
(NAA/USPS-ST42-1)

The United States Postal Service hereby provides the response of witness O'Tormey to the following interrogatory of the Newspaper Association of America: NAA/USPS-ST42-1, filed on April 26, 2000.

The 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  
May 8, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS O'TORMEY  
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA**

**NAA/USPS-ST42-1** *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? If so, please describe the conclusions the Postal Service reached. If not, please explain why not.

**RESPONSE:**

The Postal Service's Engineering, Research, and Development organization evaluates technology from numerous industries throughout the world. I am not aware of any specific testing by the Postal Service to evaluate the type of technology you described for the distribution of flat mail. However, I've been told that due to the wide array of flat mail types, this technology would not be beneficial for flat mail distribution.

**DECLARATION**

I, Walter F. O'Tormey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

*Walter F. O'Tormey*

Dated: 5-8-00

## 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 horizontal line.

Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990 Fax -5402  
May 8, 2000