

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-103-114)

June 20, 2000

Pursuant to Rules 25-27, I hereby submit interrogatories to the United States Postal Service. These interrogatories are timely under Rule 25(a) because they will develop evidence to rebut evidence submitted by another participant.

The instructions contained in my interrogatories to witness Mayo (DFC/USPS-1-9) are incorporated herein by reference.

Respectfully submitted,



Dated: June 20, 2000

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

June 20, 2000
Emeryville, California

DFC/USPS-103. Please refer to the response to DFC/STAMPS.COM-T1-1(d), (e), (g), (h), and (i). Is witness Heselton correct in suggesting that some postal facilities sort IBIP (FIM "D") mail to a stacker for pre-bar-coded FIM mail? If so, please identify these postal facilities and reconcile this information with the response to DFC/USPS-66.

DFC/USPS-104. Please explain the extent to which the Postal Service agrees with the premise of DFC/STAMPS.COM-T1-2(c), which suggests that omission of a ZIP+4 Code in a typewritten, OCR-readable address is inconsequential for mail processing because the MLOCR will perform a database lookup and spray a correct delivery-point bar code.

DFC/USPS-105. Please refer to DFC/STAMPS.COM-T1-5(b) and witness Heselton's response.

- a. Please explain whether my ability to print an envelope addressed to a nonexistent street address using Stamps.com software likely was possible only because of an anomaly or error in the AMS database.
- b. Is the AMS database designed to identify errors such as the one described in DFC/STAMPS.COM-T1-5(b)? Please explain.
- c. Is the AMS database typically capable of identifying nonexistent street numbers that fall within a valid number range on a particular street? Or will it accept invalid street numbers that fall within a valid range? Please explain.

DFC/USPS-106. Please refer to the response to DFC/STAMPS.COM-T1-6(d).

- a. Please confirm that the Postal Service has instructed employees to handle properly bundled IBIP letters as bundled metered mail. If you do not confirm, please explain.
- b. Please confirm that the 020 operation that trays bundled metered mail typically does not make a separation for pre-bar-coded mail that should be taken directly to a BCS. If you do not confirm, please explain.
- c. Please confirm that witness Heselton's suggestion that "it would be more expeditious" for the Postal Service to take IBIP mail "directly to a barcode reader for processing" would require 020 operations to create an additional separation and an additional mail stream. If you do not confirm, please explain.
- d. Does the Postal Service agree with witness Heselton's suggestion that "it would be more expeditious" for the Postal Service to take bundled IBIP mail "directly to a barcode reader for processing"? Please explain.
- e. Please discuss the amount of mail-processing costs (per letter) that are avoided in processing bundled metered letters compared to the benchmark of loose, handwritten letters.

DFC/USPS-107. Please refer to the response to DFC/STAMPS.COM-T1-7(a). Does improperly dated IBIP and metered mail incur the same per-piece processing costs as

properly dated IBIP and metered mail? Please explain. If the answer is yes, please reconcile the response with the response to DFC/USPS-T10-9.

DFC/USPS-108. Please refer to the response to DFC/STAMPS.COM-T1-7. Does use of the date in Stamps.com's postage servers as the default date when customers print IBIP indicia likely lead to a larger quantity of stale-dated IBIP mail than the Postal Service would receive if the software required customers to confirm that the date the system proposed to print on the indicia was, in fact, the customer's intended date of mailing? Please explain.

DFC/USPS-109. Do the Postal Service's published limitations on envelope size, shape, and weight for automation compatibility apply for loose mail that must pass through the culling, facing, and cancelling system? Please provide any citations to the record, postal manuals, or postal regulations that would support an affirmative answer to this question.

DFC/USPS-110. Does the Postal Service believe that #10 envelopes that weigh three ounces typically will be too thick to pass through the culling system and the AFCS?

DFC/USPS-111. Is it reasonable to assume that most mailers who fold multiple sheets of paper into #10 envelopes fold most of the sheets together, all at once, rather than folding each sheet individually?

DFC/USPS-112. Will #10 envelopes weighing two ounces and containing letter-size sheets of paper that are folded together, rather than individually, likely be too thick to pass through the culling system and the AFCS? Please explain.

DFC/USPS-113. Please state the maximum number of letter-size sheets of paper, folded together, not individually, that the Commission should assume will fit in a #10 envelope that will not measure more than 0.25 inches thick. Please identify the weight of an envelope that contains this number of sheets.

DFC/USPS-114. Suppose two letters are correctly addressed to the same address. Both letters have OCR-readable typewritten addresses and 11-digit Postnet bar codes in the address block. Both letters are fully automation-compatible, and they are deposited loose in a collection box in a large city. One envelope is prepared using IBIP and FIM "D", while the other letter has a postage stamp and a mailer-printed FIM "A". Please confirm that the FIM "A" letter likely will avoid more processing costs compared to a handwritten letter than the IBIP letter will avoid. Please explain.