

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
FOLLOW-UP INTERROGATORIES TO STAMPS.COM WITNESS
WITNESS FRANK R. HESELTON
(DFC/STAMPS.COM-T1-9-13)

June 20, 2000

Pursuant to Rules 25-27, I hereby submit interrogatories to Stamps.com witness Frank R. Heselton.

The instructions contained in my interrogatories to Postal Service witness Mayo (DFC/USPS-T39-1-9) 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/STAMPS.COM-T1-9. Please refer to your response to DFC/STAMPS.COM-T1-1(d), (e), (g), (h), and (i).

- a. Please identify the “offices” that sort all FIM mail to a FIM mail stacker and process this mail on a BCS. In your answer, please explain fully the basis for your knowledge of these offices’ processing procedures.
- b. Do these “offices” sort FIM “B” mail to a “FIM mail stacker,” too, even though FIM “B” mail is not pre-bar-coded? Please explain.
- c. At the time that you prepared your testimony and responded to DFC/STAMPS.COM-T1-9, were you aware of the Postal Service’s response to DFC/USPS-66, which indicates that FIM “D” mail is sorted to the stacker for typewritten mail, *not* the stacker for pre-bar-coded mail?
- d. Please explain why the AFCS machine should sort FIM “D” mail to a stacker for pre-bar-coded mail if, as the Postal Service indicates in its response to DFC/USPS-66, not all FIM “D” mail is pre-bar-coded.

DFC/STAMPS.COM-T1-10. Please refer to your response to DFC/STAMPS.COM-T1-1(f). Please confirm that IBIP mail incurs processing costs from ISS, RCR, and OSS if the AFCS machine is set in “lift everything” mode. If you do not confirm, please explain which of these costs IBIP mail does not incur, and please reconcile your response with the response to DFC/USPS-66.

DFC/STAMPS.COM-T1-11. Please refer to your response to DFC/STAMPS.COM-T1-6(d).

- a. Please confirm that current operating instructions direct employees to handle IBIP mail as metered mail. If you do not confirm, please explain.
- b. Please identify the number of facilities in which you have observed the operation in which postal employees unbundle bundles of metered letters and tray the letters for processing or feed them into an MLOC. Please provide dates and locations.
- c. Please confirm that the operation described in (a) presently does not, in most facilities, make a separation for pre-bar-coded mail.
- d. Please confirm that the process that you have proposed would require the operation described in (a) to add a separation for pre-bar-coded mail.
- e. Please identify all studies or analyses that you have conducted to confirm that creating this additional separation would be more expeditious than the current process of directing bundled metered letters to MLOC’s.

DFC/STAMPS.COM-T1-12. Please refer to your response to DFC/STAMPS.COM-T1-7(a). Please reconcile your response with the response to DFC/USPS-T10-9, which describes extra processing steps for incorrectly dated metered mail.

DFC/STAMPS.COM-T1-13. 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.