

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

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF
THE MCGRAW-HILL COMPANIES, INC.
(MH/USPS-T10-26)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of The McGraw-Hill Companies, Inc.: MH/USPS-T10-26, which was compelled by Presiding Officer's Ruling No. R2000-1/83, issued June 29, 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

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July 6, 2000

**COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
KINGSLEY TO FOLLOW UP INTERROGATORIES OF McGRAW-HILL
COMPANIES INC.**

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.

Response:

- (a) See attached chart for manual incoming secondary flats processing in plants.

Currently, we do not track manual volumes by shape in delivery units, however, I am told, that an effort is underway to begin tracking these volumes by shape in 2001.

- (b) The Postal Service keeps track of and counts the number of flat mail pieces that are handled manually and in mechanized and automated processing operations by collecting the data through the MODS (Management Operating Data System) and provides the volumes in charts as in the responses to Hearing Question 2 of MH at Tr. 5/2059, lines 11-13, and ANM/USPS-T10-33.

DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley
Date: July 6, 2000

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.


Susan M. Duchek

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