

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-T1-14-17)

July 17, 2000

Pursuant to Rules 25-27, I hereby submit follow-up interrogatories to Stamps.com witness Frank R. Heselton. I received the initial responses on July 8, 2000.

The instructions contained in my interrogatories to Postal Service witness Mayo (DFC/USPS-T39-1-9) are incorporated herein by reference.

Respectfully submitted,

Dated: July 17, 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

July 17, 2000
Emeryville, California

DFC/STAMPS.COM-T1-14. Please refer to your response to DFC/STAMPS.COM-T1-9.

- a. Please explain why you can state that some “offices” are in California, yet you cannot identify the specific processing facilities.
- b. Please explain in detail how you determined that the letters “showed no indication of having their address read and processed.”
- c. Please confirm that MLOCR’s can read bar codes in the address block. If you do not confirm, please explain.
- d. Please confirm that an MLOCR will not spray a bar code at the bottom of the envelope if the MLOCR successfully reads a delivery-point bar code in the address block.
- e. Please confirm that, under normal circumstances, the following two envelopes will have the same processing marks: (1) an envelope processed on an AFCS and displaying a delivery-point bar code in the address block that is routed to a bar-code sorter; (2) an envelope processed on an AFCS and displaying a delivery-point bar code in the address block that is routed to an MLOCR. If you do not confirm, please explain in detail the differences in processing marks.
- f. In your response to DFC/STAMPS.COM-T1-9(c), you stated that the Postal Service’s use of the word “currently” suggests that the Postal Service will change processing of FIM “D” mail on AFCS machines in the future. Please provide all other facts and information supporting your contention that the Postal Service will change processing of FIM “D” mail in the future.

DFC/STAMPS.COM-T1-15. Please refer to your response to DFC/STAMPS.COM-T1-10. Do you contend that the Postal Service never operates AFCS machines in “lift everything” mode? If yes, please provide all facts and information supporting your contention. If not, please confirm that IBIP mail processed on an AFCS machine in “lift everything” mode may incur costs from ISS, RCR, and OSS. (Consistent with the

response to DFC/USPS-103, please assume that the AFCS machine sorts FIM "D" mail to the stacker for typewritten mail, not the stacker for pre-bar-coded mail.)

DFC/STAMPS.COM-T1-16. Please refer to your response to DFC/STAMPS.COM-T1-12.

- a. Please provide all facts and information supporting your contention that "the policy is for the mailer to take back the mailing and apply the correct date" and "[i]f such mail is found in the mailstream, the policy is to warn the mailer."
- b. Please provide all facts and information supporting your contention that the Postal Service generally does not overcancel incorrectly dated metered mail.

DFC/STAMPS.COM-T1-17. Please refer to your response to DFC/STAMPS.COM-T1-13.

- a. Please confirm that an unknown portion of letter-sized IBIP mail that would receive the four-cent discount that Stamps.com proposes would be rejected from the culling system as too thick and would need to be faced manually. If you do not confirm, please explain and provide the specific portion and quantity.
- b. Please confirm that the Commission should assume that letter-sized IBIP mail paying either the two-ounce rate or the three-ounce rate likely is rejected from the culling system as too thick and must be faced manually. If you do not confirm, please identify the number of sheets of various sizes and weights of paper that, you believe, will consistently fit in letter-size envelopes paying either the two-ounce rate or the three-ounce rate but not be too thick to pass through the culling system and AFCS.
- c. For the most-recent period for which statistics are available, please provide the quantity of letter-sized mail for which Stamps.com customers printed postage on envelopes to pay the two-ounce rate and the three-ounce rate. Please also express these quantities as a percentage of total volume of Stamps.com postage printed on letter-size envelopes.