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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001 POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(POSTCOM/USPS-T-39-1-11)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-39-1-11.

Respectfully submitted,

Ian Volner

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October 10, 2001

POSTCOM/USPS-T39-1. Please confirm that there is a difference in address quality between automation mail and nonautomation mail. If you do not confirm, please explain.

- (a) Please describe why there is a difference in address quality between automation flats and nonautomation flats.
- (b) Please provide any studies, reports, or analyses addressing address quality issues including, but not limited to, the Undeliverable as Addressed report and Address Quality Study.
- (c) Please provide the underlying data used to produce the studies, reports, and analyses in subpart (b) of this interrogatory and provide documentation of the methodology used by the Postal Service to analyze the data.

POSTCOM/USPS-T39-2. Please list and describe all of the factors that cause an automation flat to be less expensive for the Postal Service to handle than a similar nonautomation flat.

- (a) Individually for each factor, indicate whether the resulting savings are modeled in the flats mail processing cost models contained in USPS LR-J-61.
- (b) For each factor not modeled in USPS LR-J-61, please describe in detail why it reduces Postal Service costs.
- (c) For each factor not modeled in USPS LR-J-61, please provide a copy of all studies, reports, and analyses that discuss or quantify the benefits to the Postal Service of the factor.

POSTCOM/USPS-T39-3. Please list and describe the level of clerks by flats mail processing operations including, but not limited to, mechanized package handling, manual package handling, AFSM 100 automated, AFSM 100 VCS keying, FSM 881 automated, FSM 1000 automated, FSM 1000 keying, and manual flats casing operations.

POSTCOM/USPS-T39-4. Please provide the labor rates by level of clerk excluding service wide costs for FY 01 and for the Test Year. Please provide the labor rates by level of clerk, fully loaded with service wide costs, for FY 01 and for the Test Year.

POSTCOM/USPS-T39-5. Please refer to page 18 at 16-28 of your testimony where you discuss the significant processing concern related to the OCR on the FSMs.

- (a) Please provide any reports, studies, field instructions, analyses, or data that address or quantify this concern. If reports, studies, field instructions, analyses, or data do not exist, please discuss the incidence of this significant processing concern.
- (b) Please describe the typical mailflows and list the typical mail processing, allied, and delivery operations for a nonbarcoded, machinable 3-digit flat where an OCR interprets the return address as the delivery address during incoming primary processing and for a barcoded, machinable 3-digit flat where the BCR successfully interprets the delivery address.

POSTCOM/USPS-T39-6. Please provide any reports, studies, analyses, or data that quantify the incidence of or costs of missorted mail.

POSTCOM/USPS-T39-7. Please identify and discuss the mailflow of missorted flats including, but not limited to, mail processing, allied, and delivery operations. Please identify and describe the scheme and operation where missorted flats can be noticed and the rework required for accurate distribution.

POSTCOM/USPS-T39-8. Please refer to your discussion on sorting flats to DPS on page 20 at 2-20 of your testimony.

- (a) Please confirm that the Postal Service generally sorts 5D automation letters to DPS in two passes on automated sorting equipment. If not confirmed, please explain. Does the Postal Service expect to implement a similar approach to DPSing flats? If no, please explain fully.
- (b) Please confirm that the Postal Service does not expect to sort nonbarcoded flats to DPS. If you confirm, please explain why. If you do not confirm, please explain.
- (c) How does the Postal Service sort nonmachinable letters to DPS? Does the Postal Service expect to implement a similar approach to sorting nonbarcoded flats to DPS?
- (d) Please identify the expected mail processing, allied, and delivery operations incurred or avoided due to sorting flats to DPS.

POSTCOM/USPS-T-39-9. Please refer to the operations estimates of the incoming secondary machinable flats coverage factors in USPS-LR-J-61.

- (a) Please provide the data, analyses, and assumptions underlying these estimates.
- (b) Please explain if and how these estimates vary by mail piece characteristics (including, but not limited to, class, piece weight within

machinability requirements, piece size within machinability requirements, uniformity of mail to be processed, and presence of a barcode), plant, tour, operating window, flats volume, and other factors you deem appropriate.

POSTCOM/USPS-T-39-10. Please provide the most recent updates or issues of the Corporate Flats Strategy, Strategic Improvement Guide for Flats Processing (Pub.128), Management Instructions for handling Loop Mail (PO-420-1999-1), national Standard Operating Procedures (SOP) for processing flat-shaped mail, joint USPS-Periodicals Industry Operations Review team's March 1999 report, and instructions to the field stating national policies concerning FSM utilization, maximizing automation processing, and the proper staffing for all FSM operations.

POSTCOM/USPS-T-39-11. Please refer to the Federal Register proposed rule on August 28, 2001 concerning Domestic Mail Manual Changes to Allow Co-Packaging of Automation Rate and Presorted Rate Flats. Please provide and describe the "Postal statistics [that] show that barcoded flats sort at a higher rate than nonbarcoded flats in primary processing operations."

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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