

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

OCT 10 2 08 PM '01

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 BOZZO  
(POSTCOM/USPS-T-14-1)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for  
Postal Commerce submits the attached interrogatories to USPS witness Bozzo:  
PostCom/USPS-T-14-1.

Respectfully submitted,



Ian D. Volner  
N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

October 10, 2001

**POSTCOM/USPS-T14-1.** On page 7 of your testimony, you mention that you visited mail processing facilities to "reality check" your econometric estimates of volume variability.

- (a) On these visits, did you have an opportunity to observe FSM and manual flat sorting operations?
- (b) If your answer to subpart (a) is yes, did you notice whether clerks were more likely to sort barcoded flats on machines than they were to sort nonbarcoded flats on machines? If so, please explain fully.
- (c) Are you aware of any data (whether from MODS, IOCS, or any other source) that quantifies the extent to which barcoded flats are more likely to be processed on machines than nonbarcoded flats? If so, please state the data source and quantify the extent to which barcoded flats are more likely to be processed on machines?

**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.



N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W., Suite 1000  
Washington, DC 20005-3917  
202.962.4957  
[nfwiggins@venable.com](mailto:nfwiggins@venable.com)  
Counsel to the Association for Postal Commerce

October 10, 2001