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

POSTAL RATE AND FEE CHANGES, 2001 | Docket No. R2001-1

INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS KINGSLEY

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Kingsley: DMA/USPS-T39, Nos. 1-24. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.

Dana T. Ackerly II

Dated: October 25, 2001

INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY

DMA/USPS-T39-1. Please provide the deployment schedule for Phase II for the AFSM 100.

DMA/USPS-T39-2. On page 16 of your testimony you state, "Throughput on the AFSM 100 is approximately 17,000 pieces per hour and the staffing requirement is five employees on the machine and up to three video coding keyers depending on mail readability."

(a) Does the complement of five include those who are prepping the mail for the AFSM 100?

(b) What is the PS level and average pay of the video coders?

(c) What is the PS level and average pay of mail preppers?

(d) What is the PS level and average pay of employees staffing the machine?

(e) What is the PS level and average pay of employees who sort flats manually?

(f) What is the PS level and average pay of employees on FSM 881 crews?

(g) What is the PS level and average pay of employees on FSM 1000 crews?

(h) Are there times when almost all the mail is machine readable?

(i) If your answer to (h) is yes, how many video coders will be assigned to the machine during these times?

(j) On average, how many video coders are assigned to the machine?

(k) What is the productivity of the AFSM 100?

DMA/USPS-T39-3. How many hours per day does the average AFSM 100 run?

DMA/USPS-T39-4. When deployment of Phase II is complete, how many hours per day will the average AFSM 100 run?

DMA/USPS-T39-5. On page 16 of your testimony you state, "The FSM 1000 has reduced the volume processed in manual operations."

(a) Please provide the number of manual flat sorts, the number of sorts on the AFSM 100, the number of sorts on the 881, and the number of sorts on the FSM 1000 that were performed by the Postal Service in the base year.

(b) Please provide an estimate of each of the sorts requested in (a) above for the Test Year.

DMA/USPS-T39-6. On page 16 of your testimony you state, "Each FSM also has the flexibility to operate with less than a full crew in light volume periods."

(a) While the machines are operating, please confirm that the Postal Service actually matches crew size to the volume. If you cannot confirm, please explain why the Postal Service does not match crew size to volume.

(b) Does a full crew require the same supervision as a much smaller crew?

(c) If your answer to (b) is yes, please provide a detailed explanation of why this is so.

DMA/USPS-T39-7. You describe three different types of equipment for sorting flats.

(a) Do the same clerks work on the AFSM 100, the FSM 1000, and the FSM 881?

(b) If so, when clerks move from one type of machine to another, do they clock into different MODS operations?

(c) Do supervisors clock into MODS operations?

(d) If so, do they clock into the same operation as the clerks and mailhandlers they are supervising? If not, into which MODS operations do they clock?

DMA/USPS-T39-8. Please provide the deployment schedule for the OCR and flats feeder modification for the FSM 1000.

DMA/USPS-T39-9. Please describe the process the USPS uses to decide where to locate new mail processing equipment.

DMA/USPS-T39-10. If a plant receives an AFSM 100, is its labor hour budget reduced?

DMA/USPS-T39-11. On page 17 of your testimony you state, "Much of the distribution that has been performed manually in delivery units is being automated in plants."

(a) How many incoming secondary flat distributions were there in the base year?

(b) Of these, how many were performed manually in delivery units in the base year?

(c) Of the number in (a), how many were performed manually in plants in the base year?

(d) Of the number in (a), how many were automated in plants in the base year?

(e) How many incoming secondary flat distributions are there projected to be in the test year?

(f) Of these, how many will be performed manually in delivery units?

(g) Of the number in (e), how many will be performed manually in plants?

(h) Of the number in (e), how many will be automated in plants?

DMA/USPS-T39-12. On page 17 of your testimony you state, "Flats that remain in manual operation at the plant today (other than for incoming secondary processing) are pieces that do not meet the processing specifications for the FSM 1000 or are rejects from that machine."

(a) What percentage of flats do not meet the processing specification for the FSM 1000 in the base year?

(b) In the test year?

DMA/USPS-T39-13. What percentage of all non-carrier route presorted flats will bear a barcode in the Test Year?

DMA/USPS-T39-14. On page 18 of your testimony you state, "As of AP 12 FY 01, the percent of total flats workload in plants was 54 percent on the AFSM 100, 17 percent on the FSM 1000, 14 percent on the FSM 881, and 15 percent in manual sortation."

(a) Please provide and explain your measure of workload.

(b) Please provide a similar distribution for the base year.

(c) Please provide a similar estimate for the test year.

(d) Please provide a comparable figure for AP 12 FY 01, the base year, and the test year for plants and DDUs combined.

DMA/USPS-T39-15. Please describe in detail the supervision of flats processing. Please include in the description an explanation of how the span-of-control is determined.

DMA/USPS-T39-16. Have there been revisions to Handbook M-32, Management Operating Data System since it was filed as USPS Library Reference H-147 in Docket No. R97-1? If so, please provide the revised handbook as a library reference.

DMA/USPS-T39-17. Footnote 7 on page 4 of your testimony says, "Throughput is very different than productivity."

(a) Please provide base year productivity for the Multiline Optical Character Reader.

(b) Please provide test year productivity for the Multiline Optical Character Reader.

(c) Please provide base year productivity for the Delivery Bar Code Sorter.

(d) Please provide test year productivity for the Delivery Bar Code Sorter.

(e) Please provide base year productivity for the Carrier Sequence Bar Code Sorter.

(f) Please provide test year productivity for the Carrier Sequence Bar Code Sorter.

(g) Please provide base year productivity for the Letter Mail Labeling Machine.

(h) Please provide test year productivity for the Letter Mail Labeling Machine.

(i) Please provide base year productivity for incoming secondary manual sorts for letters.

(j) Please provide test year productivity for incoming secondary manual sorts for letters.

(k) Please provide base year productivity for outgoing primary manual sorts for letters.

(l) Please provide test year productivity for outgoing primary manual sorts for letters.

DMA/USPS-T39-18. Your testimony says that the Phase I deployment of the AFSM 100 is complete.

(a) When was the deployment complete?

(b) Please provide the schedule for the Phase I deployment.

DMA/USPS-T39-19. In discussing the AFSM 100, you describe the "possibility of future expansion to more bins."

(a) Are there any plans for such an expansion?

(b) If so, when will it take place?

(c) How many more bins are contemplated?

DMA/USPS-T39-20. On pages 15 through 16 of your testimony, you state, "AFSM 100s are undergoing a performance modification to increase the machine's throughput as a result of a new software release and minor hardware changes."

(a) Will the modification also increase productivity?

(b) If so, what is the expected new productivity?

(c) When will the modification be complete?

(d) Please provide a deployment schedule for the modification, including the schedule for those machines for which the deployment is already complete.

DMA/USPS-T39-21. On page 13 of your testimony you state, "By FY 2003, the number of FSM 881s in operation is expected to be reduced to approximately 110. They will be primarily relocated to smaller facilities."

(a) By FY 2003, how many facilities will have one or more AFSM 100s but no FSM 881s?

(b) By FY 2003, how many facilities will have no AFSM 100s but one or more FSM 881s?

(c) By FY 2003, how many facilities will have one or more AFSM 100s and one or more FSM 881s?

(d) By FY 2003, how many facilities will have neither AFSM 100s nor FSM 881s?

DMA/USPS-T39-22. In USPS Library Reference J-49, witness Tayman provides an explanation of Cost Reduction and Other Programs. On page 7 and 8 he describes the Identification Code Sort Program. He says, "There are two types of savings expected from ICS. The largest portion of savings will come from keeping an estimated 803 million pieces of mail per year in the automated letter mail stream that would have otherwise been rejected and sent to manual processing operations....The second portion of savings will come from 1.63 billion mail pieces per year that will no longer require labeling and rebarcoding."

(a) On average, how many automated sorts will each of the 803 million pieces per year receive?

(b) On average, how many sorts would each of the 803 million pieces per year received in manual processing in the absence of this program?

(c) On average, how many times would each of the 1.63 billion pieces be labeled and rebarcoded?

(d) What is the productivity of labeling and rebarcoding?

(e) What level are the staff who label and rebarcode?

DMA/USPS-T39-23. In USPS Library Reference J-49, witness Tayman provides an explanation of Cost Reduction and Other Programs. On page 9, he describes the Automated Feeders and OCR program for the FSM 1000. According to the library reference, "These enhancements will increase machine throughput and permit over 70% of the mail pieces fed to the FSM 1000 to be sorted automatically instead of being manually keyed."

(a) Please provide a schedule for this deployment.

(b) Will productivity as well as throughput be increased?

(c) What will productivity be after the enhancements?

(d) What percentage of the pieces are now manually keyed?

(e) What is the productivity of manual keying currently on the FSM 1000?

(f) What is the productivity of OCR sorts currently?

DMA/USPS-T39-24. Based upon actual FY 2000 data and your expertise on the FY 2003 operating environment, please complete the following table. Please provide sources of information and the basis for all assumptions.

Table 1. TPH and TPH by Flat Sorting Operation

Operation	FY 2000		FY 2003	
	TPH	TPF	TPH	TPF
AFSM 100				
FSM 1000				
FSM 881				
Manual Flat Sorting (Function 1)				
Manual Flat Sorting (Function 4)				