

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, 2001

Docket No. R2001-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(POSTCOM/USPS-T-39-13-16)

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-39-13-16.

Respectfully submitted,



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Counsel for Association for Postal Commerce

October 26, 2001

POSTCOM/USPS-T39-13. Please refer to your response to POSTCOM/USPS-T39-9(b) where you state, "If volumes were exceptionally heavy, some volumes would likely be sent to manual sortation to carrier route." In these situations, is the Postal Service more likely or less likely to send nonbarcoded flats to manual sortation than to send barcoded flats that are similar in every way other than the presence of a barcode to manual sortation? Please explain your response fully.

POSTCOM/USPS-T39-14. Please refer to your response to POSTCOM/USPS-T39-5 where you discuss the mailflows of pieces where the OCR reads the return address as the delivery address. Please confirm that the MODS system counts these pieces as being "handled" and therefore these missorts are included in TPH.

POSTCOM/USPS-T39-15. Please refer to your response to POSTCOM/USPS-T39-8(b) where you state, "As explained on pages 15 and 16 of my testimony, non-barcoded flat-shaped mail is currently sorted to the carrier-route level when an address match can be achieved through either the OCR or on-line video coding. A similar concept could be envisioned in a delivery point sequencing environment. Engineering is also looking at various alternatives of placing a barcoded ID code on non-prebarcoded flats in order to use an OCR of keying result more than once."

- (a) How likely do you think it is that the Postal Service will adopt the approach of placing a barcoded ID code on nonbarcoded Standard Regular mail? Please explain your response fully.
- (b) How likely do you think it is that the Postal Service will sort flats to DPS by matching addresses through either the OCR or on-line video coding?
- (c) What do you expect the OCR read rate will be for sorting nonbarcoded flats to DPS? Please explain your answer fully and provide any underlying data you used to develop your estimate.

POSTCOM/USPS-T39-16. Please refer to your response to POSTCOM/USPS-T39-8(c) where you state, "Carrier in-office casing would be expected to be avoided for DPS flats."

- (a) What is the Postal Service's average productivity for carrier in-office casing of flats? Please describe the data source that you used to develop this figure.
- (b) If you are unable to respond to (a), do you expect that the average productivity for carrier in-office casing is similar to the manual flat sorting productivity for clerks at delivery units?

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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