

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 MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS LINDA KINGSLEY
(MPA/USPS-T39-1)
(November 1, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Linda Kingsley.

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

James Pierce Myers
Attorney at Law
1617 Courtland Road
Alexandria, VA 22306
Phone: 703-660-1002
Fax: 703-660-1037
jpm@piercemyers.com

Docket No. R2001-1

MPA/USPS-T39-1. Please refer to page 15 of your testimony where you state, "Phase I deployment of 175 machines is complete. Phase II deployment of 362 machines began in December 2000 and is scheduled for completion in April 2002."

(a) When was Phase I of the Automated Flat Sorting Machine 100 (AFSM 100) deployment completed?

(b) Please confirm that the Phase II deployment is still scheduled for completion in April 2002. If not confirmed, please provide the correct completion date.

(c) Please confirm that, in Phase II, the Postal Service plans to deploy 362 AFSM 100s.

(d) Is the Postal Service planning a Phase III AFSM 100 deployment?

(e) If your response to subpart (d) of this interrogatory is yes, when will the deployment begin?

(f) If your response to subpart (d) of this interrogatory is yes, when will the deployment end?

(g) If your response to subpart (d) of this interrogatory is yes, how many machines will the Postal Service purchase in Phase III?

(h) If your response to subpart (d) of this interrogatory is yes, what will the purpose of these machines be?

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CERTIFICATE OF SERVICE

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



James Pierce Myers
Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

November 1, 2001
Alexandria, VA