

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF DIRECT MARKETING
ASSOCIATION, INC.
(DMA/USPS-T39-1-24)

The United States Postal Service hereby provides the response of witness
Kingsley to the following interrogatories of Direct Marketing Association, Inc.:
DMA/USPS-T39-1-24, filed on October 25, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Joseph K. Moore

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November 8, 2001

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

DMA/USPS-T-39-1 Please provide the deployment schedule for Phase II for the AFSM 100.

Response: See attachment.

AT-5M P-1175C II deployment

PH1 SEQ. #	PH2 AFSM SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
2	2	EA	South Jersey P&DC #1	NJ	2	13-Jan-01	5-Feb-01
	2009	EA	South Jersey P&DC #1	NJ	2	13-Jan-01	5-Feb-01
	2010	GL	Royal Oak P&DC #1	MI	2	13-Jan-01	5-Feb-01
	2012	PA	San Francisco P&DC #1	CA	4	13-Jan-01	5-Feb-01
	2013	SE	Tampa P&DC #1	FL	2	13-Jan-01	5-Feb-01
	2014	SW	North Houston P&DC #1	TX	3	13-Jan-01	5-Feb-01
	2011	WE	Minneapolis P&DC #1	MN	5	13-Jan-01	5-Feb-01
	2015	CM	Lincoln IMF #1	MD	2	20-Jan-01	12-Feb-01
	2016	EA	Columbia P&DC	SC	1	20-Jan-01	12-Feb-01
	2017	EA	Greensboro P&DC #1	NC	2	20-Jan-01	12-Feb-01
	2018	NE	Buffalo P&DC #1	NY	2	20-Jan-01	12-Feb-01
	2019	NY	Westchester P&DC #1	NY	2	20-Jan-01	12-Feb-01
	2020	SE	North Metro P&DC #1	GA	4	20-Jan-01	12-Feb-01
	2021	EA	Southeastern P&DC #1	PA	2	27-Jan-01	19-Feb-01
	2022	GL	Palatine P&DC #1	IL	4	27-Jan-01	19-Feb-01
	2024	PA	Santa Ana P&DC #1	CA	2	27-Jan-01	19-Feb-01
	2025	SW	North Texas P&DC #1	TX	2	27-Jan-01	19-Feb-01
	2026	WE	Abilene P&DC #1	NM	2	27-Jan-01	19-Feb-01
	2023	WE	St Paul P&DC #1	MN	2	27-Jan-01	19-Feb-01
	2027	CM	Richmond P&DC #1	VA	3	3-Feb-01	26-Feb-01
	2028	CM	Richmond P&DC #1	VA	3	3-Feb-01	26-Feb-01
	2030	SE	Jacksonville P&DC T&Ame#1	FL	3	3-Feb-01	26-Feb-01
	2031	SE	Nashville P&DC Anneau#1	TN	3	3-Feb-01	26-Feb-01
	2032	WE	Everett P&DC	WA	1	3-Feb-01	26-Feb-01
	2029	WE	Springfield P&DC	MO	1	3-Feb-01	26-Feb-01
	2033	EA	South Jersey P&DC #2	NJ		10-Feb-01	5-Mar-01
	2034	GL	Royal Oak P&DC #2	MI		10-Feb-01	5-Mar-01
	2036	PA	Los Angeles P&DC #1	CA	6	10-Feb-01	5-Mar-01
	2037	PA	Oakland P&DC #1	CA	4	10-Feb-01	5-Mar-01
	2038	SW	North Houston P&DC #2	TX		10-Feb-01	5-Mar-01
	2035	WE	Minneapolis P&DC #2	MN		10-Feb-01	5-Mar-01
	2039	CM	Lincoln IMF #2	MD		17-Feb-01	12-Mar-01
	2040	EA	Greensboro P&DC #2	NC		17-Feb-01	12-Mar-01
	2041	NE	Buffalo P&DC #2	NY		17-Feb-01	12-Mar-01
	2042	NY	Brooklyn P&DC #1	GA	2	17-Feb-01	12-Mar-01
	2043	SE	North Metro P&DC #2	CO	2	17-Feb-01	12-Mar-01
	2044	WE	Denver P&DC #1	KY	2	24-Feb-01	19-Mar-01
	2047	EA	Louisville P&DC #1	PA		24-Feb-01	19-Mar-01
	2045	EA	Southeastern P&DC #2	IL		24-Feb-01	19-Mar-01
	2046	GL	Palatine P&DC #2	CA		24-Feb-01	19-Mar-01
	2049	PA	Santa Ana P&DC #2	CA		24-Feb-01	19-Mar-01
	2050	SW	North Texas P&DC #2	TX		24-Feb-01	19-Mar-01
	2048	WE	St Paul P&DC #2	MN		24-Feb-01	19-Mar-01
	2051	CM	Dallas P&DC #1	VA	2	3-Mar-01	26-Mar-01
	2053	CM	Richmond P&DC #2	IN	2	3-Mar-01	26-Mar-01
	2052	GL	Indianapolis P&DC #1	CA		3-Mar-01	26-Mar-01
	2054	PA	Los Angeles P&DC #2	FL		3-Mar-01	26-Mar-01
	2055	SE	Jacksonville P&DC T&Ame#2	AZ	5	3-Mar-01	26-Mar-01
	2056	WE	Rio Salado MPO #1	PA	2	10-Mar-01	2-Apr-01
	2057	EA	Lancaster P&DC #1	MA	1	10-Mar-01	2-Apr-01
	2059	NE	Springfield P&DC	CA	4	10-Mar-01	2-Apr-01
	2060	PA	Sacramento P&DC #1	TX		10-Mar-01	2-Apr-01
	2061	PA	San Francisco P&DC #2	NM		10-Mar-01	2-Apr-01
	2062	SW	North Houston P&DC #3	PA	2	17-Mar-01	9-Apr-01
	2063	EA	Lehigh Valley P&DC #1	ME	1	17-Mar-01	9-Apr-01
	2064	NE	Northwest Annex	NY		17-Mar-01	9-Apr-01
	2065	NY	Brooklyn P&DC #2	FL	3	17-Mar-01	9-Apr-01
	2066	SE	Miami P&DC #1	OK	3	17-Mar-01	9-Apr-01
	2067	SW	Oklahoma City P&DC #1	CO		17-Mar-01	9-Apr-01
	2068	WE	Denver P&DC #2	MD	2	24-Mar-01	16-Apr-01
	2069	CM	Suburban P&DC #1	KY		24-Mar-01	16-Apr-01
	2071	EA	Louisville P&DC #2	VA	1	24-Mar-01	18-Apr-01
	2072	EA	Rancho P&DC				

ATTACHMENT TO
DMA/USPS-T39-1

PH1 SEQ. #	PH2 AFSA SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSA 100 DELIVERY	START ACCEPT TEST
2070	GL	South Suburban P&DC #1	IL	2	24-Mar-01	16-Apr-01	
2073	GL	St Louis P&DC #1	MO	4	24-Mar-01	16-Apr-01	
2074	SE	Fl Myers P&DC	FL	1	24-Mar-01	16-Apr-01	
2075	GL	Indianapolis P&DC #2	IN	1	31-Mar-01	23-Apr-01	
2077	NE	Rochester P&DC	NY	1	31-Mar-01	23-Apr-01	
2078	NY	Western Nassau P&DC	NY	1	31-Mar-01	23-Apr-01	
2079	PA	Los Angeles P&DC #3	CA	1	31-Mar-01	23-Apr-01	
2076	WE	Kansas City P&DC #1	MO	3	31-Mar-01	23-Apr-01	
2080	WE	Rio Salado MPO #2	AZ	3	31-Mar-01	23-Apr-01	
2082	CM	Northern VA P&DC #2	VA	1	7-Apr-01	30-Apr-01	
2081	EA	Lancaster P&DC #2	PA	1	7-Apr-01	30-Apr-01	
2084	NY	Trenton P&DC #1	NJ	2	7-Apr-01	30-Apr-01	
2085	PA	San Francisco P&DC #3	CA	1	7-Apr-01	30-Apr-01	
2086	SW	New Orleans P&DC #1	LA	4	7-Apr-01	30-Apr-01	
2083	WE	Minneapolis P&DC #4	MN	1	7-Apr-01	30-Apr-01	
2088	CM	Southern MD P&DC #1	MD	2	14-Apr-01	7-May-01	
2087	EA	Lehigh Valley P&DC #2	PA	1	14-Apr-01	7-May-01	
2090	NY	Dominick V Daniels P&DC #1	NJ	3	14-Apr-01	7-May-01	
2089	NY	San Juan PO	PR	1	14-Apr-01	7-May-01	
2091	SE	South Florida P&DC	FL	1	14-Apr-01	7-May-01	
2092	SW	Oklahoma City P&DC #2	OK	1	14-Apr-01	7-May-01	
2093	CM	Suburban P&DC #2	MD	1	21-Apr-01	14-May-01	
2094	GL	Fox Valley P&DC	IL	1	21-Apr-01	14-May-01	
2095	GL	St Louis P&DC #2	MO	1	21-Apr-01	14-May-01	
2096	NE	Providence P&DC #1	RI	2	21-Apr-01	14-May-01	
2097	SE	North Metro P&DC #3	GA	1	21-Apr-01	14-May-01	
2098	SW	Corpus Christi P&DC	TX	1	21-Apr-01	14-May-01	
2099	EA	Pittsburgh P&DC #1	PA	2	28-Apr-01	21-May-01	
2101	EA	Raleigh P&DC #1	NC	2	28-Apr-01	21-May-01	
2100	GL	Living Park Road P&DC #1	IL	2	28-Apr-01	21-May-01	
2103	PA	Los Angeles P&DC #4	CA	1	28-Apr-01	21-May-01	
2102	WE	Kansas City P&DC #2	MO	1	28-Apr-01	21-May-01	
2104	WE	Rio Salado MPO #3	AZ	1	28-Apr-01	21-May-01	
2105	CM	Dulles P&DC #2	VA	1	5-May-01	28-May-01	
2106	NE	Syracuse P&DC #1	NY	2	5-May-01	28-May-01	
2109	NY	Mid-Hudson P&DC	NY	1	5-May-01	28-May-01	
2107	NY	Trenton P&DC #2	NJ	1	5-May-01	28-May-01	
2109	PA	Sacramento P&DC #2	CA	1	5-May-01	28-May-01	
2110	SW	New Orleans P&DC #2	LA	1	5-May-01	28-May-01	
2111	EA	Cleveland P&DC #1	OH	2	12-May-01	4-Jun-01	
2112	GL	Chicago Central P&DC #1	IL	3	12-May-01	4-Jun-01	
2114	NY	Queens P&DC	NY	1	12-May-01	4-Jun-01	
2113	NY	Westchester P&DC #2	NY	1	12-May-01	4-Jun-01	
2115	SW	Fl Worth P&DC #1	TX	2	12-May-01	4-Jun-01	
2116	WE	Boise P&DC	ID	1	12-May-01	4-Jun-01	
2117	CM	Baltimore P&DC #1	MD	2	19-May-01	11-Jun-01	
2118	GL	St Louis P&DC #3	MO	1	19-May-01	11-Jun-01	
2119	NE	Southern Connecticut P&DC	CT	1	19-May-01	11-Jun-01	
2120	PA	Anaheim P&DC	CA	1	19-May-01	11-Jun-01	
2121	SE	North Metro P&DC #4	GA	1	19-May-01	11-Jun-01	
2122	WE	Portland P&DC #1	OR	2	19-May-01	11-Jun-01	
2125	EA	North Park Annex (P&DC)	NC	1	26-May-01	18-Jun-01	
2123	EA	Pittsburgh P&DC #2	PA	1	26-May-01	18-Jun-01	
2124	GL	Detroit P&DC #1	MI	5	26-May-01	18-Jun-01	
2127	PA	ML Sellers P&DC #1	CA	3	26-May-01	18-Jun-01	
2126	WE	Kansas City P&DC (KS)	KS	1	26-May-01	18-Jun-01	
2128	WE	Rio Salado MPO #4	AZ	1	26-May-01	18-Jun-01	
2130	CM	Norfolk P&DC #1	VA	2	2-Jun-01	25-Jun-01	
2129	CM	Northam VA P&DC #3	VA	1	2-Jun-01	25-Jun-01	
2131	GL	Central WI P&DC	WI	1	2-Jun-01	25-Jun-01	
2132	NE	Central Mass P&DC #1	MA	2	2-Jun-01	25-Jun-01	
2133	SE	Tampa P&DC #2	FL	1	2-Jun-01	25-Jun-01	
2134	SW	New Orleans P&DC #3	LA	1	2-Jun-01	25-Jun-01	

PH1 SEQ. #	PH2 AFSM SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
	362+2					Sat, 0 day	2 Monday
	2136	CM	Washington P&DC #1	DC	2	9-Jun-01	2-Jul-01
	2135	EA	Cleveland P&DC #2	OH		9-Jun-01	2-Jul-01
	2138	EA	Lexington P&DC	KY	1	9-Jun-01	2-Jul-01
	2137	GL	Chicago Central P&DC #2	IL		9-Jun-01	2-Jul-01
	2139	NY	Mid-Island P&DC #1	NY	2	9-Jun-01	2-Jul-01
	2140	NY	NJI BMC	NY	1	9-Jun-01	2-Jul-01
	2141	EA	Raleigh P&DC #2	NC		16-Jun-01	9-Jul-01
	2142	GL	St Louis P&DC #4	MO		16-Jun-01	9-Jul-01
	2143	PA	Oakland P&DC #2	CA		16-Jun-01	9-Jul-01
	2144	SE	Atlanta P&DC #1	GA	5	16-Jun-01	9-Jul-01
	2145	SW	Ft Worth P&DC #2	TX		16-Jun-01	9-Jul-01
	2146	WE	Salt Lake City P&DC #1	UT	2	16-Jun-01	9-Jul-01
	2147	GL	Detroit P&DC #2	MI		23-Jun-01	16-Jul-01
	2148	NE	NW Boston P&DC #1	MA	2	23-Jun-01	16-Jul-01
	2149	NY	Dominick V Daniels P&DC #2	NJ		23-Jun-01	16-Jul-01
	2150	PA	ML Sellers P&DC #2	CA		23-Jun-01	16-Jul-01
	2151	SE	Birmingham P&DC Annex #1	AL	2	23-Jun-01	16-Jul-01
	2152	WE	North Valley DDC	AZ	1	23-Jun-01	16-Jul-01
	2154	CM	Norfolk P&DC #2	VA		30-Jun-01	23-Jul-01
	2153	EA	Reading P&DF	PA	1	30-Jun-01	23-Jul-01
	2155	NE	Central Mass P&DC #2	MA		30-Jun-01	23-Jul-01
	2156	PA	Marina P&DC #1	CA	2	30-Jun-01	23-Jul-01
	2157	SE	Manasota P&DC	FL	1	30-Jun-01	23-Jul-01
	2158	SW	New Orleans P&DC #4	LA		30-Jun-01	23-Jul-01
	2159	CM	Washington P&DC #2	DC		7-Jul-01	30-Jul-01
	2161	EA	Greenville P&DC Annex	SC	1	7-Jul-01	30-Jul-01
	2160	GL	Chicago Central P&DC #3	IL		7-Jul-01	30-Jul-01
	2162	SE	Orlando #1 P&DC	FL	2	7-Jul-01	30-Jul-01
	2163	SW	Dallas P&DC #1	TX	4	7-Jul-01	30-Jul-01
	2164	WE	Portland P&DC #2	OR		7-Jul-01	30-Jul-01
	2167	EA	Charlotte P&DC #1	NC	2	14-Jul-01	6-Aug-01
	2165	EA	New Castle P&DF	PA	1	14-Jul-01	6-Aug-01
	2166	GL	Gary P&DC	IN	1	14-Jul-01	6-Aug-01
	2169	PA	Oakland P&DC #3	CA		14-Jul-01	6-Aug-01
	2168	WE	Des Moines P&DC #1	IA	2	14-Jul-01	6-Aug-01
	2170	WE	Reno P&DC	NV	1	14-Jul-01	6-Aug-01
	2171	CM	Frederick P&DF	MD	1	21-Jul-01	13-Aug-01
	2172	GL	Detroit P&DC #3	MI		21-Jul-01	13-Aug-01
	2173	NE	Manchester P&DC	NH	1	21-Jul-01	13-Aug-01
	2174	NY	Mid-Island P&DC #2	NY		21-Jul-01	13-Aug-01
	2175	SE	Mid-Florida P&DC	FL	1	21-Jul-01	13-Aug-01
	2176	SW	Shreveport P&DC #1	LA	2	21-Jul-01	13-Aug-01
	2177	EA	Delaware P&DC	DE	1	28-Jul-01	20-Aug-01
	2178	GL	South Suburban P&DC #2	IL		28-Jul-01	20-Aug-01
	2180	NE	Albany P&DC	NY	1	28-Jul-01	20-Aug-01
	2181	NE	Stamford P&DC #1	CT	3	28-Jul-01	20-Aug-01
	2182	PA	Marina P&DC #2	CA		28-Jul-01	20-Aug-01
	2179	WE	Omaha P&DC #1	NE	2	28-Jul-01	20-Aug-01
	2183	CM	Southern MD P&DC #2	MD		4-Aug-01	27-Aug-01
	2184	GL	Irving Park Road P&DC #2	IL		4-Aug-01	27-Aug-01
	2185	PA	San Bernardino P&DC #1	CA	2	4-Aug-01	27-Aug-01
	2186	SE	Jackson P&DC #1	MS	2	4-Aug-01	27-Aug-01
	2187	SW	Dallas P&DC #2	TX		4-Aug-01	27-Aug-01
	2188	WE	Salt Lake City P&DC #2	UT		4-Aug-01	27-Aug-01
	2189	EA	Columbus P&DC (new) #1	OH	5	11-Aug-01	3-Sep-01
	2190	EA	Philadelphia P&DC #1	PA	4	11-Aug-01	3-Sep-01
	2192	NY	Paterson P&DC	NJ	1	11-Aug-01	3-Sep-01
	2193	PA	San Jose P&DC #1	CA	2	11-Aug-01	3-Sep-01
	2191	WE	Des Moines P&DC #2	IA		11-Aug-01	3-Sep-01
	2194	WE	Eugene P&DC	OR	1	11-Aug-01	3-Sep-01
	2198	CM	Charlottesville (old P&DF)	VA	1	18-Aug-01	10-Sep-01
	2195	EA	Erie P&DC	PA	1	18-Aug-01	10-Sep-01
	2196	EA	Johnstown P&DF	PA	1	18-Aug-01	10-Sep-01

PH1 SEQ. #	PH2 SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
2197	GL	Detroit P&DC #4		MI		18-Aug-01	10-Sep-01
2200	SW	Shreveport P&DC #2		LA		18-Aug-01	10-Sep-01
2199	WE	Wichita P&DC		KS	1	18-Aug-01	10-Sep-01
2201	GL	Kalamazoo P&DC #1		MI	2	25-Aug-01	17-Sep-01
2203	NE	Stamford P&DC #2		CT		25-Aug-01	17-Sep-01
2204	NE	Syracuse P&DC #2		NY		25-Aug-01	17-Sep-01
2205	NY	Hackensack P&DC		NJ	1	25-Aug-01	17-Sep-01
2206	SE	West Palm Beach P&DC #1		FL	2	25-Aug-01	17-Sep-01
2202	WE	Minneapolis P&DC #5		MIN		25-Aug-01	17-Sep-01
2207	GL	Palatine P&DC #3		IL		1-Sep-01	24-Sep-01
2208	NY	Morgan P&DC #1		NY	3	1-Sep-01	24-Sep-01
2209	PA	San Bernardino P&DC #2		CA		1-Sep-01	24-Sep-01
2210	SE	Jackson P&DC #2		MS		1-Sep-01	24-Sep-01
2211	SW	Dallas P&DC #3		TX		1-Sep-01	24-Sep-01
2212	WE	Seattle P&DC		WA	1	1-Sep-01	24-Sep-01
2215	CM	Baltimore P&DC #2		MD		8-Sep-01	1-Oct-01
2213	EA	Columbus P&DC (new) #2		OH		8-Sep-01	1-Oct-01
2214	EA	Philadelphia P&DC #2		PA		8-Sep-01	1-Oct-01
2216	SE	Memphis P&DC		TN	1	8-Sep-01	1-Oct-01
2217	SW	Baton Rouge P&DC		LA	1	8-Sep-01	1-Oct-01
2218	WE	Rio Salado MPO #5		AZ		8-Sep-01	1-Oct-01
2220	EA	Charlotte P&DC #2		NC		15-Sep-01	8-Oct-01
2219	GL	Grand Rapids Annex		MI	1	15-Sep-01	8-Oct-01
2222	NE	NW Boston P&DC #2		MA		15-Sep-01	8-Oct-01
2223	NY	Kilmer P&DC		NJ	1	15-Sep-01	8-Oct-01
2224	WE	Anchororage P&DC		AK	1	15-Sep-01	8-Oct-01
2221	WE	Kansas City P&DC #3		MO		15-Sep-01	8-Oct-01
2225	EA	Akron P&DC		OH	1	22-Sep-01	15-Oct-01
2226	NY	JAF P&DC		NY	1	22-Sep-01	15-Oct-01
2227	PA	Fresno P&DC		CA	1	22-Sep-01	15-Oct-01
2228	PA	North Bay P&DC #1		CA	2	22-Sep-01	15-Oct-01
2229	SE	West Palm Beach P&DC #2		FL		22-Sep-01	15-Oct-01
2230	WE	Colorado Springs P&DC		CO	1	22-Sep-01	15-Oct-01
2232	EA	Charleston P&DC		WV	1	29-Sep-01	22-Oct-01
2231	GL	Palatine P&DC #4		IL		29-Sep-01	22-Oct-01
2233	NY	Morgan P&DC #2		NY		29-Sep-01	22-Oct-01
2234	SE	Macon P&DC Annex		GA	1	29-Sep-01	22-Oct-01
2235	SW	Dallas P&DC #4		TX		29-Sep-01	22-Oct-01
2236	WE	East King County DDG		WA	1	29-Sep-01	22-Oct-01
2237	EA	Columbus P&DC (new) #3		OH		6-Oct-01	29-Oct-01
2238	EA	Philadelphia P&DC #3		PA		6-Oct-01	29-Oct-01
2239	GL	Rockford P&DC		IL	1	6-Oct-01	29-Oct-01
2240	PA	Los Angeles P&DC #5		CA		6-Oct-01	29-Oct-01
2241	SE	St Petersburg P&DC #1		FL	2	6-Oct-01	29-Oct-01
2242	WE	Salem P&DC		OR	1	6-Oct-01	29-Oct-01
2243	NE	Stamford P&DC #3		CT		13-Oct-01	5-Nov-01
2244	NY	Newark P&DC		NJ	1	13-Oct-01	5-Nov-01
2245	PA	Sacramento P&DC #3		CA		13-Oct-01	5-Nov-01
2246	SE	Atlanta P&DC #2		GA		13-Oct-01	5-Nov-01
2247	SE	Gainesville P&DC		FL	1	13-Oct-01	5-Nov-01
2248	SW	Houston North Annex #1		TX	2	13-Oct-01	5-Nov-01
2249	EA	Asheville P&DC		NC	1	20-Oct-01	13-Nov-01
2250	EA	Charleston P&DC		SC	1	20-Oct-01	13-Nov-01
2251	GL	Green Bay P&DC		WI	1	20-Oct-01	13-Nov-01
2252	NE	Portland P&DC		ME	1	20-Oct-01	13-Nov-01
2253	PA	North Bay P&DC #2		CA		20-Oct-01	13-Nov-01
2254	SW	Little Rock P&DC #1		AR	2	20-Oct-01	13-Nov-01
2257	EA	Evansville MPA		IN	1	27-Oct-01	17-Nov-01
2258	EA	Florence P&DC		SC	1	27-Oct-01	17-Nov-01
2255	GL	Peoria P&DC		IL	1	27-Oct-01	17-Nov-01
2256	GL	Saginaw P&DC		MI	1	27-Oct-01	17-Nov-01
2259	NE	Providence P&DC #2		RI		27-Oct-01	17-Nov-01
2260	WE	Seattle AMC		WA	1	27-Oct-01	17-Nov-01

PH1 SEQ. #	PH2 AFSSM SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSSM 100 DELIVERY	ACCEPT TEST START
2261	EA	Columbus P&DC (new) #4	OH		3-Nov-01	28-Nov-01	
2262	EA	Philadelphia P&DC #4	PA		3-Nov-01	28-Nov-01	
2263	NY	Dominick V Daniles P&DC #3	NJ		3-Nov-01	28-Nov-01	
2264	PA	Los Angeles P&DC #6	CA		3-Nov-01	28-Nov-01	
2265	SE	SL Petersburg P&DC #2	FL		3-Nov-01	28-Nov-01	
2266	SW	Oklahoma City P&DC #3	OK		3-Nov-01	28-Nov-01	
2267	EA	Hickory P&DC	NC		3-Nov-01	3-Dec-01	
2268	NY	Monmouth P&DC	NJ		10-Nov-01	3-Dec-01	
2269	PA	San Francisco P&DC #4	CA		10-Nov-01	3-Dec-01	
2270	SE	Pensacola P&DC	FL		10-Nov-01	3-Dec-01	
2271	SW	Houston North Annex #2	TX		10-Nov-01	3-Dec-01	
2272	WE	Billings P&DC	MT		10-Nov-01	3-Dec-01	
2273	CM	Richmond P&DC #3	VA		17-Nov-01	10-Dec-01	
2274	EA	Kinston P&DC	NC		17-Nov-01	10-Dec-01	
2275	NY	Rocky Mount P&DC	NC		17-Nov-01	10-Dec-01	
2276	WE	JFK ISC	NY		17-Nov-01	10-Dec-01	
2277	WE	Lincoln P&DC	NE		17-Nov-01	10-Dec-01	
2278	WE	Spokane P&DC	WA		17-Nov-01	10-Dec-01	
2279	GL	Madison P&DC	WI		24-Nov-01	17-Dec-01	
2280	NE	Midlax-Exeter P&DC #1	MA		24-Nov-01	17-Dec-01	
2281	PA	Oakland P&DC #4	CA		24-Nov-01	17-Dec-01	
2282	SE	Birmingham P&DC Annex #2	AL		24-Nov-01	17-Dec-01	
2283	SE	Miami P&DC #2	FL		24-Nov-01	17-Dec-01	
2284	SW	Austin P&DC	TX		1-Dec-01	7-Jan-02	
2285	EA	Columbus P&DC (new) #5	OH		1-Dec-01	7-Jan-02	
2287	EA	Lynchburg P&DC	KY		1-Dec-01	7-Jan-02	
2288	GL	Ft. P&DC	MI		1-Dec-01	7-Jan-02	
2289	NY	Staten Island	NY		1-Dec-01	7-Jan-02	
2290	PA	ML Sellers P&DC #3	CA		1-Dec-01	7-Jan-02	
2291	WE	Rochester P&DC	MI		1-Dec-01	7-Jan-02	
2292	GL	Lansing P&DC	MI		1-Dec-01	7-Jan-02	
2293	GL	Mid-Missouri P&DC	MO		1-Dec-01	7-Jan-02	
2294	GL	South Bend P&DC	IN		1-Dec-01	7-Jan-02	
2295	SE	Dayton Beach P&DC	FL		1-Dec-01	7-Jan-02	
2296	WE	Tacoma P&DC	WA		1-Dec-01	7-Jan-02	
2297	EA	Cincinnati P&DC #1	OH		1-Dec-01	7-Jan-02	
2298	NE	New Haven, CT MPO	CT		1-Dec-01	7-Jan-02	
2299	NY	Morgan P&DC #3	NY		1-Dec-01	7-Jan-02	
2300	NY	West Jersey P&DC	NJ		1-Dec-01	7-Jan-02	
2301	SE	Atlanta P&DC #3	GA		1-Dec-01	7-Jan-02	
2302	WE	Eau Claire P&DC	WI		1-Dec-01	7-Jan-02	
2303	EA	Dayton P&DC #1	OH		1-Dec-01	7-Jan-02	
2304	GL	Kalamazoo P&DC #2	MI		1-Dec-01	7-Jan-02	
2305	NE	Midlax-Exeter P&DC #2	MA		1-Dec-01	7-Jan-02	
2306	PA	San Jose P&DC #2	CA		1-Dec-01	7-Jan-02	
2307	SW	Midland P&DC	TX		1-Dec-01	7-Jan-02	
2308	SW	San Antonio P&DC #1	TX		1-Dec-01	7-Jan-02	
2309	PA	Sacramento P&DC #4	CA		1-Dec-01	7-Jan-02	
2310	SE	Midland P&DC #3	FL		1-Dec-01	7-Jan-02	
2311	SW	Anarillo P&DC	TX		1-Dec-01	7-Jan-02	
2312	WE	Albuquerque P&DC #2	NM		1-Dec-01	7-Jan-02	
2313	WE	Duluth P&DC	GA		1-Dec-01	7-Jan-02	
2314	WE	Olympia P&DC	WA		1-Dec-01	7-Jan-02	
2315	EA	Canon P&DC	OH		1-Dec-01	7-Jan-02	
2316	PA	Santa Barbara P&DC	CA		1-Dec-01	7-Jan-02	
2317	SW	Houston P&DC #1	TX		1-Dec-01	7-Jan-02	
2318	WE	Quad Cities P&DC	IL		1-Dec-01	7-Jan-02	
2319	WE	Topoka P&DC	KS		1-Dec-01	7-Jan-02	
2320	WE	Waterloo P&DC	IA		1-Dec-01	7-Jan-02	
2321	EA	Cincinnati P&DC #2	OH		1-Dec-01	7-Jan-02	
2322	GL	Clarkburg P&DC	WV		1-Dec-01	7-Jan-02	
2323	GL	Carroll Stream P&DC	IL		1-Dec-01	7-Jan-02	

PH1 SEQ. #	PH2 AFSM SEQ. #	AREA	PLANT	ST	PH2 UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
	362+2					Sat.: 6 day	Monday
	2323	GL	Detroit P&DC #5	MI		26-Jan-02	18-Feb-02
	2325	SW	Lafayette P&DF	LA	1	26-Jan-02	18-Feb-02
	2326	SW	San Antonio P&DC #2	TX		26-Jan-02	18-Feb-02
	2327	EA	Dayton P&DC #2	OH		2-Feb-02	25-Feb-02
	2328	GL	Indianapolis MPA	IN	1	2-Feb-02	25-Feb-02
	2330	PA	Honolulu P&DC #1	HI	2	2-Feb-02	25-Feb-02
	2331	SE	Mobile P&DC	AL	1	2-Feb-02	25-Feb-02
	2332	SE	Nashville P&DC Annex#2	TN		2-Feb-02	25-Feb-02
	2329	WE	Mankato P&DF	MN	1	2-Feb-02	25-Feb-02
	2333	EA	Scranton P&DF	PA	1	9-Feb-02	4-Mar-02
	2334	GL	Traverse City P&DF	MI	1	9-Feb-02	4-Mar-02
	2335	PA	City of Industry #1	CA	2	9-Feb-02	4-Mar-02
	2336	PA	Stockton P&DC #1	CA	2	9-Feb-02	4-Mar-02
	2337	SE	Knoxville P&DC	TN	1	9-Feb-02	4-Mar-02
	2338	SW	Tulsa P&DC	OK	1	9-Feb-02	4-Mar-02
	2339	GL	Oshkosh P&DF	WI	1	16-Feb-02	11-Mar-02
	2341	SE	Lakeland P&DC	FL	1	16-Feb-02	11-Mar-02
	2342	SE	Tallahassee P&DF	FL	1	16-Feb-02	11-Mar-02
	2343	SW	Fayetteville P&DC	AR	1	16-Feb-02	11-Mar-02
	2344	SW	San Antonio P&DC #3	TX		16-Feb-02	11-Mar-02
	2340	WE	Cape Girardeau P&DF	MO	1	16-Feb-02	11-Mar-02
	2345	EA	Youngstown P&DC	OH	1	23-Feb-02	18-Mar-02
	2347	PA	Pasadena P&DC	CA	1	23-Feb-02	18-Mar-02
	2348	SW	Beaumont P&DF	TX	1	23-Feb-02	18-Mar-02
	2349	SW	Houston P&DC #2	TX		23-Feb-02	18-Mar-02
	2350	SW	Little Rock P&DC #2	AR		23-Feb-02	18-Mar-02
	2346	WE	Sioux City P&DF	IA	1	23-Feb-02	18-Mar-02
	2351	GL	Champaign P&DC	IL	1	2-Mar-02	25-Mar-02
	2354	PA	Honolulu P&DC #2	HI		2-Mar-02	25-Mar-02
	2355	PA	Long Beach P&DC	CA	1	2-Mar-02	25-Mar-02
	2356	SE	Nashville P&DC Annex#3	TN		2-Mar-02	25-Mar-02
	2353	WE	Cedar Rapids P&DC	IA	1	2-Mar-02	25-Mar-02
	2352	WE	St Cloud P&DF	MN	1	2-Mar-02	25-Mar-02
	2357	PA	City of Industry #2	CA		9-Mar-02	1-Apr-02
	2358	PA	Stockton P&DC #2	CA		9-Mar-02	1-Apr-02
	2361	SE	Atlanta P&DC #4	GA		9-Mar-02	1-Apr-02
	2360	SE	Miami AMC	FL	1	9-Mar-02	1-Apr-02
	2362	SE	Orlando #2 P&DC	FL		9-Mar-02	1-Apr-02
	2359	SE	Savannah P&DC Annex	GA	1	9-Mar-02	1-Apr-02
	2364	SE	Atlanta P&DC #5	GA		16-Mar-02	8-Apr-02
	2365	SE	Huntsville P&DF	AL	1	16-Mar-02	8-Apr-02
	2366	SE	Jacksonville P&DC TAnnex#3	FL		16-Mar-02	8-Apr-02
	2367	SW	San Antonio P&DC #4	TX		16-Mar-02	8-Apr-02
	2363	WE	Omaha P&DC #2	NE		16-Mar-02	8-Apr-02
	2369	EA	Toledo P&DC	OH	1	23-Mar-02	15-Apr-02
	2370	GL	Milwaukee P&DC	WI	1	23-Mar-02	15-Apr-02
	2371	SW	Abilene MPO	TX	1	23-Mar-02	15-Apr-02
	2368	SW	Houston P&DC #3	TX		23-Mar-02	15-Apr-02
	2372	SW	San Antonio P&DC #5	TX		23-Mar-02	15-Apr-02
2	364				364		

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

DMA/USPS-T-39-2 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?

Response:

- (a) No.
- (b) – (g) See response to POSTCOM/USPS-T39-3 and 4.
- (h) Yes.
- (i) None.
- (j) Three.
- (k) The productivities for the AFSM 100 are contained in LR-J-61, page 87 (for Standard Mail), sponsored by Witness Miller (USPS-T-24).

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

DMA/USPS-T-39-3 How many hours per day does the average AFSM 100 run?

Response:

I am informed that the average number of AFSM 100 run hours per day for AP 13, FY 2001, was approximately 21.2. However, the run hours (regardless of the type of equipment) can include the time that the machine is "on" but not feeding mail. For example, time that a crew may be on break or in the process of sweeping a machine for a scheme change could be included in machine run time. An extreme example is the machine could, *in theory*, be running for 20 hours a day, yet only finalized 10,000 pieces.

The more meaningful measure of utilization used by operations personnel is the average total pieces handled (TPH) per machine per day. In FY 2001 this was 220,306 pieces.

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

DMA/USPS-T-39-4 When deployment of Phase II is complete, how many hours per day will the average AFSM 100 run?

Response:

At the completion of Phase II, I am informed that the average number of hours per day that an AFSM 100 will be expected to run is approximately 16.

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

DMA/USPS-T-39-5 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.

Response:

- a. The number of base year (FY 2000) sorts in the plants were:

AFSM 100 = 518 million

FSM 1000 = 6.7 billion

FSM 881 = 15.8 billion

Manual = 6.8 billion

- b. No estimates are available for FY 2003. FY 2002 targets for flats distribution in the plants are:

AFSM 100 = 71.0%

FSM 1000 = 16.4%

FSM 881 = 5.2%

Manual = 7.4%

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

DMA/USPS-T-39-6 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.

Response:

- a. Confirmed within practical limits. For example, if volume is unexpectedly light, the supervisor will look for any available mail before considering crew reassignments.
- b. – c. Yes for unexpected light volumes as explained in my testimony on page 37. However, if light volumes are expected (e.g. perhaps outgoing processing on Saturdays) fewer supervisors may be scheduled with some of them supervising more operations.

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

DMA/USPS-T-39- 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?

Response:

- (a) See response to POSTCOM/USPS-T-39-3. For the most part, within the same job level, clerks can move from one machine, or operation, to another.
- (b) Yes.
- (c) Yes.
- (d) No. It depends on the operation they are supervising. The main numbers are 698 – 702. See the table of MODS numbers in LR-J-165 for details.

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

DMA/USPS-T-39- 8 Please provide the deployment schedule for the OCR and flats feeder modification for the FSM 1000.

Response:

See attachment.

UFSM 1000 DEPLOYMENT SCHEDULE

Attachment DMA/usps-T39-8

Install Week	AREA	PLANT			
3/15/02	GL	GRAND RAPIDS ANNEX			
3/15/02	NE	BINGHAMTON			
3/15/02	SW	DALLAS P&DC			
3/22/02	GL	GRAND RAPIDS ANNEX			
3/22/02	NY	BROOKLYN P&DC			
3/22/02	SW	NEW ORLEANS P&DC			
3/22/02	MW	ST LOUIS P&DC			
3/22/02	PA	SACRAMENTO P&DC			
3/29/02	GL	CHICAGO METRO SURFACE HUB			
3/29/02	NY	BROOKLYN P&DC			
3/29/02	SW	NEW ORLEANS P&DC			
3/29/02	MW	ST LOUIS P&DC			
3/29/02	PA	SACRAMENTO P&DC			
3/29/02	SE	NORTH ANNEX			
3/29/02	WE	SALT LAKE CITY P&DC			
4/5/02	GL	CHICAGO METRO SURFACE HUB			
4/5/02	CM	BALTIMORE P&DC			
4/5/02	SW	SHREVEPORT P&DC			
4/5/02	MW	ST LOUIS P&DC			
4/5/02	PA	SACRAMENTO P&DC			
4/5/02	SE	NORTH ANNEX			
4/5/02	WE	SALT LAKE CITY P&DC			
4/5/02	MA	GREENVILLE P&DC			
4/5/02	AL	Youngstown P&DF			
4/5/02	SE	NORTH METRO P&DC			
4/5/02	MA	CHARLOTTE P&DC			
4/12/02	GL	CAROL STREAM P&DC			
4/12/02	CM	BALTIMORE P&DC			
4/12/02	SW	LITTLE ROCK P&DC			
4/12/02	MW	ST LOUIS P&DC			
4/12/02	PA	OAKLAND P&DC			
4/12/02	SE	NORTH ANNEX			
4/12/02	WE	SALT LAKE CITY P&DC			
4/12/02	MA	GREENVILLE P&DC			
4/12/02	NE	BUFFALO P&DC			
4/12/02	SE	NORTH METRO P&DC			
4/12/02	MA	CHARLOTTE P&DC (NorthPark Annex)			
4/12/02	AL	CINCINNATI P&DC			
4/12/02	MW	MINNEAPOLIS P&DC			
4/12/02	WE	South Sound DDC (Fife WA)			
4/12/02	NY	DVD P&DC (Kearny)			
4/12/02	AL	New Castle P&DF			
4/19/02	GL	CAROL STREAM P&DC			
4/19/02	CM	BALTIMORE IMF			
4/19/02	SW	LITTLE ROCK P&DC			
4/19/02	MW	Central Wisconsin, MO P&DF			
4/19/02	PA	OAKLAND P&DC			
4/19/02	SE	North Annex (Tampa)			
4/19/02	WE	PROVO			
4/19/02	MA	COLUMBIA P&DC			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
4/19/02	NE	ROCHESTER P&DC			
4/19/02	SE	NORTH METRO P&DC			
4/19/02	MA	CHARLOTTE P&DC			
4/19/02	AL	CINCINNATI P&DC			
4/19/02	MW	MINNEAPOLIS P&DC			
4/19/02	WE	SEATTLE P&DC			
4/19/02	NY	HACKENSACK P&DC			
4/19/02	MA	NORFOLK P&DC			
4/26/02	GL	CHICAGO P&DC			
4/26/02	CM	WASHINGTON P&DC			
4/26/02	SW	FORT SMITH MPO			
4/26/02	MW	Mid-Missouri, MO P&DF			
4/26/02	PA	OAKLAND P&DC			
4/26/02	SE	ORLANDO P&DC			
4/26/02	WE	LAS VEGAS P&DC			
4/26/02	MA	CHARLESTON P&DF			
4/26/02	NE	SYRACUSE P&DC			
4/26/02	SE	ATLANTA P&DC			
4/26/02	MA	GREENSBORO ANNEX			
4/26/02	AL	LIMA P&DF			
4/26/02	MW	ST PAUL P&DC			
4/26/02	WE	SEATTLE P&DC			
4/26/02	NY	JAMES A FARLEY P&DC			
4/26/02	MA	NORFOLK P&DC			
5/3/02	GL	CHICAGO P&DC			
5/3/02	CM	WASHINGTON P&DC			
5/3/02	MA	LOUISVILLE P&DC			
5/3/02	GL	SPRINGFIELD P&DC			
5/3/02	PA	OAKLAND ISF			
5/3/02	SE	FT MYERS P&DC			
5/3/02	WE	LAS VEGAS P&DC			
5/3/02	MA	Florence P&DF			
5/3/02	NE	UTICA P&DF			
5/3/02	SE	ATLANTA P&DC			
5/3/02	MA	GREENSBORO ANNEX			
5/3/02	AL	Columbus P&DC			
5/3/02	MW	ST PAUL P&DC			
5/3/02	WE	SEATTLE P&DC			
5/3/02	NY	JFK AMC			
5/3/02	MA	NORFOLK P&DC			
5/10/02	GL	CHICAGO P&DC			
5/10/02	CM	Easton MD			
5/10/02	MA	LOUISVILLE P&DC			
5/10/02	SW	OKLAHOMA CITY P&DC			
5/10/02	PA	SAN FRANCISCO P&DC			
5/10/02	SE	FT MYERS P&DC			
5/10/02	PA	M L SELLERS P&DC			
5/10/02	MA	FAYETTEVILLE ANNEX			
5/10/02	NE	ALBANY P&DC			
5/10/02	SE	ATLANTA AMC			
5/10/02	MA	GREENSBORO ANNEX			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
5/10/02	AL	Columbus P&DC			
5/10/02	MW	ST PAUL P&DC			
5/10/02	WE	SEATTLE EAST DDC			
5/10/02	NY	JFK AMC			
5/10/02	MA	RICHMOND P&DC			
5/17/02	GL	CHICAGO P&DC			
5/17/02	CM	FREDERICK MD P&DF			
5/17/02	MA	LOUISVILLE P&DC			
5/17/02	SW	OKLAHOMA CITY Annex			
5/17/02	PA	SAN FRANCISCO P&DC			
5/17/02	SE	MIAMI P&DC			
5/17/02	PA	M L SELLERS P&DC			
5/17/02	MA	FAYETTEVILLE ANNEX			
5/17/02	NE	ALBANY P&DC			
5/17/02	SE	ATLANTA AMC			
5/17/02	MA	ROANOKE P&DC			
5/17/02	AL	AKRON P&DC			
5/17/02	GL	FOX VALLEY P&DC			
5/17/02	WE	SEATTLE AMC			
5/17/02	NY	MID-ISLAND P&DC (Melville)			
5/17/02	MA	RICHMOND P&DC			
5/24/02	MW	DES MOINES P&DC			
5/24/02	CM	Suburban MD P&DC			
5/24/02	MA	LEXINGTON P&DC			
5/24/02	SW	EAST TEXAS P&DC (Tyler)			
5/24/02	PA	SAN FRANCISCO PMA			
5/24/02	SE	MIAMI P&DC			
5/24/02	PA	ML SELLERS P&DC			
5/24/02	MA	KINSTON P&DF			
5/24/02	NY	MID-HUDSON P&DC			
5/24/02	SE	MACON P&DC			
5/24/02	MA	RALEIGH P&DC			
5/24/02	AL	CANTON P&DC			
5/24/02	GL	IRVING PARK ROAD P&DC			
5/24/02	WE	Everett P&DF			
5/24/02	NY	WESTERN NASSAU P&DC			
5/24/02	MA	ROCKY MOUNT P&DF			
5/31/02	MW	DES MOINES P&DC			
5/31/02	CM	SOUTHERN MD P&DC			
5/31/02	AL	DAYTON P&DC			
5/31/02	SW	East Texas P&DC (3/02)			
5/31/02	PA	SAN FRANCISCO ISC			
5/31/02	SE	SOUTH FLORIDA P&DC			
5/31/02	PA	SANTA ANA P&DC			
5/31/02	MA	ASHEVILLE P&DF			
5/31/02	NE	SPRINGFIELD P&DC, MA			
5/31/02	SE	Huntsville, AL			
5/31/02	MA	LYNCHBURG P&DF			
5/31/02	AL	TOLEDO P&DC			
5/31/02	GL	IRVING PARK ROAD P&DC			
5/31/02	IWE	Bend, OR			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
5/31/02	NY	KILMER P&DC (Edison)			
5/31/02	MA	HICKORY P&DF			
6/7/02	MW	OMAHA P&DF			
6/7/02	CM	NORTHERN VIRGINIA P&DC			
6/7/02	GL	INDIANAPOLIS P&DC			
6/7/02	SW	SOUTH ANNEX			
6/7/02	PA	SAN FRANCISCO ISC			
6/7/02	SE	MIAMI ISC			
6/7/02	PA	SANTA ANA P&DC			
6/7/02	MW	KANSAS CITY P&DC			
6/7/02	NE	CENTRAL MASS P&DC			
6/7/02	SE	BIRMINGHAM P&DC			
6/7/02	MA	CHARLOTTESVILLE P&DF			
6/7/02	GL	DETROIT P&DC			
6/7/02	MW	MILWAUKEE P&DC			
6/7/02	WE	SUNSET DDC (Hillsboro, OR)			
6/7/02	NY	KILMER P&DC			
6/7/02	SE	NASHVILLE P&DC			
6/14/02	MW	OMAHA P&DF			
6/14/02	CM	DULLES P&DC			
6/14/02	GL	INDIANAPOLIS P&DC			
6/14/02	SW	SOUTH ANNEX			
6/14/02	PA	STOCKTON P&DC			
6/14/02	SE	FT LAUDERDALE			
6/14/02	PA	Industry P&DC			
6/14/02	MW	KANSAS CITY P&DC			
6/14/02	NE	NORTHWEST BOSTON P&DC			
6/14/02	SE	BIRMINGHAM P&DC			
6/14/02	AL	PITTSBURGH P&DC			
6/14/02	GL	DETROIT P&DC			
6/14/02	MW	MILWAUKEE P&DC			
6/14/02	WE	SUNSET DDC			
6/14/02	NY	MONMOUTH P&DC (Eatontown)			
6/14/02	SE	NASHVILLE P&DC			
6/21/02	MW	WICHITA P&DC			
6/21/02	AL	PHILADELPHIA P&DC			
6/21/02	GL	INDIANAPOLIS MPA Annex			
6/21/02	SW	NORTH HOUSTON P&DC			
6/21/02	PA	SAN JOSE P&DC			
6/21/02	SE	WEST PALM BEACH P&DC			
6/21/02	PA	Industry P&DC			
6/21/02	MW	KANSAS CITY P&DC			
6/21/02	NE	BOSTON P&DC			
6/21/02	SE	Gulfport, MS			
6/21/02	AL	PITTSBURGH P&DC			
6/21/02	GL	DETROIT P&DC			
6/21/02	MW	MILWAUKEE P&DC			
6/21/02	WE	SUNSET DDC			
6/21/02	AL	SOUTH JERSEY P&DC			
6/21/02	SE	KNOXVILLE P&DC			
6/28/02	MW	TOPEKA P&DF			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
6/28/02	AL	PHILADELPHIA P&DC			
6/28/02	GL	GARY P&DC			
6/28/02	SW	NORTH HOUSTON P&DC			
6/28/02	PA	FRESNO P&DC			
6/28/02	NY	SAN JUAN			
6/28/02	PA	SANTA CLARITA P&DC			
6/28/02	SW	TULSA P&DC			
6/28/02	NE	MIDDLESEX-ESSEX P&DC			
6/28/02	SW	BATON ROUGE P&DC			
6/28/02	AL	PITTSBURGH P&DC			
6/28/02	GL	FLINT P&DC			
6/28/02	MW	MADISON P&DC			
6/28/02	WE	PORTLAND P&DC			
6/28/02	AL	SOUTHEASTERN P&DC			
6/28/02	SE	CHATTANOOGA P&DC			
7/5/02	SW	Wichita Falls (3/02)			
7/5/02	AL	LEHIGH VALLEY P&DC			
7/5/02	GL	JACKSON DDC			
7/5/02	SW	AUSTIN P&DC			
7/5/02	PA	Los Angeles ISC			
7/5/02	SE	Manasota P&DC			
7/5/02	PA	SANTA CLARITA P&DC			
7/5/02	WE	ALBUQUERQUE P&DC			
7/5/02	NE	MIDDLESEX-ESSEX P&DC			
7/5/02	SW	BEAUMONT P&DF			
7/5/02	AL	JOHNSTOWN P&DF			
7/5/02	AL	CLEVELAND P&DC			
7/5/02	GL	O'HARE AMC			
7/5/02	WE	PORTLAND P&DC			
7/5/02	AL	SOUTHEASTERN P&DC			
7/5/02	SE	JACKSON P&DC			
7/12/02	SW	FORT WORTH P&DC			
7/12/02	AL	LEHIGH VALLEY P&DC			
7/12/02	SE	MEMPHIS P&DC			
7/12/02	SW	McAllen P&DF			
7/12/02	PA	LOS ANGELES P&DC			
7/12/02	SE	MID - FLORIDA P&DC			
7/12/02	PA	SAN BERNARDINO P&DC			
7/12/02	WE	ALBUQUERQUE P&DC			
7/12/02	NE	MANCHESTER P&DC			
7/12/02	SW	Houston P&DC			
7/12/02	MA	CHARLESTON P&DC			
7/12/02	AL	CLEVELAND P&DC			
7/12/02	GL	O'HARE AMC			
7/12/02	WE	MOUNT HOOD DDC (Portland OR)			
7/12/02	AL	LANCASTER P&DC			
7/12/02	SW	LAFAYETTE P&DF			
7/19/02	SW	FORT WORTH P&DC			
7/19/02	AL	HARRISBURG P&DC			
7/19/02	SE	MEMPHIS P&DC			
7/19/02	SW	McALLEN P&DF			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
7/19/02	PA	LOS ANGELES P&DC			
7/19/02	SE	MID - FLORIDA P&DC			
7/19/02	PA	BAKERSFIELD P&DC			
7/19/02	WE	ALBUQUERQUE P&DC			
7/19/02	NE	Northwest Annex - Maine			
7/19/02	SW	Houston North Annex			
7/19/02	MA	CLARKSBURG P&DF			
7/19/02	AL	CLEVELAND P&DC			
7/19/02	GL	PALATINE P&DC			
7/19/02	WE	SALEM P&DF			
7/19/02	AL	READING P&DF			
7/19/02	SW	ALEXANDRIA MPO			
7/26/02	SW	DALLAS P&DC			
7/26/02	AL	WILKES - BARRE P&DF			
7/26/02	MA	BOWLING GREEN P&DF			
7/26/02	SW	CORPUS CHRISTI P&DC			
7/26/02	PA	ANAHEIM P&DF			
7/26/02	SE	JACKSONVILLE INTNL ANNEX			
7/26/02	PA	Worldway AMC			
7/26/02	WE	TUCSON P&DC			
7/26/02	NE	PORTLAND P&DC			
7/26/02	SW	SAN ANTONIO P&DC			
7/26/02	MA	HUNTINGTON P&DF			
7/26/02	AL	Mansfield CSF			
7/26/02	GL	PALATINE P&DC			
7/26/02	WE	EUGENE P&DF			
7/26/02	NY	TRENTON P&DC			
7/26/02	SE	MOBILE P&DC			
8/2/02	SW	DALLAS P&DC			
8/2/02	NY	Bronx P&D			
8/2/02	SW	DALLAS ISC			
8/2/02	SW	EL PASO P&DC			
8/2/02	PA	LONG BEACH P&DC			
8/2/02	SE	JACKSONVILLE INTNL ANNEX			
8/2/02	PA	MARINA P&DC			
8/2/02	WE	RIO SALADO			
8/2/02	NE	EASTERN MAINE P&DF			
8/2/02	SW	SAN ANTONIO P&DC			
8/2/02	AL	ERIE P&DC			
8/2/02	AL	Mansfield CSF			
8/2/02	GL	PALATINE P&DC			
8/2/02	WE	ANCHORAGE P&DC			
8/2/02	NY	PATERSON P&DC			
8/2/02	SE	MONTGOMERY P&DC			
8/9/02	SW	NORTH TEXAS P&DC			
8/9/02	NY	MORGAN P&DC			
8/9/02	MA	EVANSVILLE P&DF			
8/9/02	SW	MIDLAND P&DF			
8/9/02	WE	RENO P&DC			
8/9/02	SE	GAINESVILLE P&DF			
8/9/02	PA	HONOLULU P&DC			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
8/9/02	WE	RIO SALADO			
8/9/02	NE	BROCKTON P&DC			
8/9/02	SW	SAN ANTONIO P&DC			
8/9/02	GL	LANSING P&DC			
8/9/02	NY	PMPC			
8/9/02	GL	SOUTH SUBURBAN P&DC			
8/9/02	WE	SPOKANE P&DC			
8/9/02	NY	NJI & BMC (Jersey City)			
8/9/02	SE	Pensacola, FL			
8/16/02	SW	NORTH TEXAS P&DC			
8/16/02	NY	MORGAN P&DC			
8/16/02	MA	PADUCAH P&DF			
8/16/02	SW	Lubbock P&DF (3/02)			
8/16/02	WE	Cheyenne WY			
8/16/02	SE	TALLAHASSEE P&DF			
8/16/02	WE	DENVER P&DC			
8/16/02	WE	RIO SALADO			
8/16/02	NE	Cape Cod			
8/16/02	SW	WACO ANNEX			
8/16/02	GL	SAGINAW P&DC			
8/16/02	NY	QUEENS P&DC			
8/16/02	WE	DENVER P&DC			
8/16/02	WE	BOISE P&DC			
8/16/02	AL	DELAWARE P&DC			
8/16/02	SE	Panama City, FL			
8/23/02	SW	NORTH TEXAS P&DC			
8/23/02	NY	MORGAN P&DC			
8/23/02	GL	CHAMPAIGN P&DF			
8/23/02	SW	LUBBOCK P&DF			
8/23/02	WE	COLORADO SPRINGS P&DC			
8/23/02	SE	LAKELAND P&DC			
8/23/02	WE	DENVER P&DC			
8/23/02	SW	AMARILLO P&DF			
8/23/02	NE	PROVIDENCE P&DC			
8/23/02	SW	TULSA P&DC			
8/23/02	GL	ROYAL OAK P&DC			
8/23/02	NY	WESTCHESTER P&DC			
8/23/02	WE	DENVER P&DC			
8/23/02	WE	BILLINGS P&DC			
8/23/02	NE	Hartford P&DC			
8/23/02	NY	WEST JERSEY P&DC (Whippany)			
8/30/02	NY	MORGAN P&DC			
8/30/02	GL	ROCKFORD P&DC			
8/30/02	SW	Abilene P&DC			
8/30/02	SE	ST PETERSBURG P&DC			
8/30/02	WE	DENVER P&DC			
8/30/02	NE	HARTFORD P&DC			
8/30/02	NE	SOUTHERN CT			
8/30/02	NY	WESTCHESTER P&DC			
8/30/02	WE	COLORADO SPRINGS P&DC			
9/6/02	NE	Hartford P&DC			

UFSM 1000 DEPLOYMENT SCHEDULE

3/15/02	GL	GRAND RAPIDS ANNEX			
* Yellow-Sites that have been added to the schedule based on comparing deployment schedul					
*Blue-First Article Test Site					
*Green-Sites that were on the deployment schedule but not listed on the site list					

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

DMA/USPS-T-39- 9 Please describe the process the USPS uses to decide where to locate new mail processing equipment.

Response:

See OCA/USPS-91h. and i.

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

DMA/USPS-T-39- 10 If a plant receives an AFSM 100, is its labor hour budget reduced?

Response:

Yes.

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

DMA/USPS-T-39- 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?

Response:

- (a) Assuming the question is asking about delivery zones, there were approximately 40,000 zones requiring some incoming secondary distribution in the base year. See response to AOL-TW/USPS-T-39-5(g).
- (b) – (c) Incoming secondary distribution is performed manually for approximately 33,000 zones. I am unaware of data that breaks out the number in plants versus in delivery units.

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

- (d) See response to AOL-TW/USPS-T-39-5(g).
- (e) Assuming the question is asking about estimating the number of delivery zones in the test year, I am unaware of data that predict the number.
- (f) – (g) Based on the current number of delivery zones provided in subpart (a), it is estimated that 31,200 will be processed manually in plants and delivery units in the test year. I am unaware of data that predicts the number in plants versus in delivery units.
- (h) See response to AOL-TW/USPS- T-39-5(g).

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

DMA/USPS-T-39-12 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?

RESPONSE:

(a) See response to AOL-TW/USPS-T39-7, part (c).

(b) I would expect that the percentage estimate would be the same for both the
Base Year and the Test Year.

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

DMA/USPS-T-39-13 What percentage of all non-carrier route presorted flats will bear a barcode in the Test Year?

RESPONSE:

Estimates project that approximately 84% of non-carrier route presorted flats will bear a barcode in the test year.

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

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.

RESPONSE:

- (a) Workload is equivalent to the pieces finalized for all levels of sortation in mail processing facilities, outgoing through incoming secondary flats operations.

- (b) Also see response to DMA/USPS-T39-5a.

AFSM 100 = 2%

FSM 1000 = 23%

FSM 881 = 53%

Manual = 23%

- (c) See response to DMA/USPS-T39-5b. Estimates are not available for FY 2003.

- (d) Comparable figures for AP 12, FY 01 for plants and DDUs combined are approximately:

AFSM 100 = 38%

FSM 1000 = 12%

FSM 881 = 10%

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

Manual = 40%

The additional manual volumes from delivery units are approximate values based on conversions from feet to pieces. See response to AOL-TW/USPS-3.

Data are not available for the Base Year since volume data collected in delivery units did not break out flats from letters prior to FY 2001. Also, estimates are not available for FY 2003.

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

DMA/USPS-T-39-15 Please describe in detail the supervision of flats processing. Please include in the description an explanation of how the span-of-control is determined.

RESPONSE:

Supervision is discussed on pages 37 and 38 of my testimony. Span-of-control is determined locally and is heavily dependent on plant-specific factors such as floor layout, number of machines, workload, dispatch times, dispatch locations, etc.

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

DMA/USPS-T-39-16 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.

RESPONSE:

A copy of the most recent version of Handbook M-32, Management Operation Data System has been provided in USPS-LR-J-165. Also, attached at the end of the LR is the most recent listing of MODS Operation Numbers, which includes updates on what is listed in Appendix A of the M-32.

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

DMA/USPS-T-39-17 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.

RESPONSE:

(a) – (l) I am unaware of estimates for Test Year productivities. The available productivities can be found in USPS LR-J-60, sponsored by Witness Miller (USPS-T-22) on page 46 for First-Class Mail and page 81 for Standard Mail.

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

DMA/USPS-T-39-18 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.

RESPONSE:

- (a) December, 2000
- (b) See attachment.

AFSM PHASE I Deployment 100

ATTACHMENT TO
DMA/USPS-T39-18

PH2 SEQ. #	PH1 SEQ. #	AREA	PLANT	ST	TOTAL UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
8	170+1+2				173	Sat, 0 day	Monday
	2	HQ	Baltimore (NG Training Ctr, Eng)	MD		06-Jul-99	
	3	HQ	Baltimore (NG Training Ctr, ILS)	MD		27-Jul-99	
	1	CM	Baltimore P&DC (Pre-Prod)	MD	0	28-Aug-99	13-Sep-99
	4	HQ	Baltimore (NG Training Ctr, T1)	MD		30-Oct-99	
	5	HQ	Baltimore (NG Training Ctr, T2)	MD		30-Oct-99	
	6	MW	St Paul P&DC (First Article)	MN	2	22-Feb-00	20-Mar-00
	10	HQ	Baltimore (NG Training Ctr, T3)	MD		25-Feb-00	
	13	HQ	Baltimore (NG Training Ctr, T4)	MD		25-Feb-00	
	7	AL	Harrisburg P&DC #1	PA	2	01-Apr-00	24-Apr-00
	8	PA	Industry P&DC	CA	1	15-Apr-00	08-May-00
	9	NE	Buffalo P&DC	NY	1	22-Apr-00	15-May-00
	12	CM	Dulles P&DC	VA	1	29-Apr-00	22-May-00
	11	SE	Atlanta P&DC	GA	1	29-Apr-00	22-May-00
	14	MA	Columbia P&DC	SC	1	06-May-00	29-May-00
	15	MA	Fayetteville P&DC	NC	1	06-May-00	29-May-00
	17	NY	Mid-Island P&DC #1	NY	2	13-May-00	05-Jun-00
	18	GL	Chicago Central P&DC #1	IL	2	20-May-00	12-Jun-00
	16	GL	Indianapolis MPA #1	IN	2	20-May-00	12-Jun-00
	19	WE	Spokane P&DC	WA	1	20-May-00	12-Jun-00
	20	AL	Cleveland P&DC #1	OH	2	03-Jun-00	26-Jun-00
	21	NE	Hartford P&DC #1	CT	3	03-Jun-00	26-Jun-00
	22	SW	Tulsa P&DC #1	OK	2	03-Jun-00	26-Jun-00
	23	CM	No Virginia P&DC	VA	1	10-Jun-00	03-Jul-00
	24	PA	San Francisco P&DC #1	CA	2	10-Jun-00	03-Jul-00
	25	SE	Jacksonville P&DC (TAnnex)	FL	1	10-Jun-00	03-Jul-00
	26	WE	Las Vegas P&DC #1	NV	3	10-Jun-00	03-Jul-00
	31	CM	Washington DC P&DC	DC	1	17-Jun-00	10-Jul-00
	27	GL	Indianapolis MPA #2	IN		17-Jun-00	10-Jul-00
	29	MW	Milwaukee P&DC #1	WI	4	17-Jun-00	10-Jul-00
	30	MW	Milwaukee P&DC #2	WI		17-Jun-00	10-Jul-00
	28	NY	Mid-Island P&DC #2	NY		17-Jun-00	10-Jul-00
	33	AL	Cleveland P&DC #2	OH		24-Jun-00	17-Jul-00
	32	GL	Chicago Central P&DC #2	IL		24-Jun-00	17-Jul-00
	34	MA	Greenville P&DC	SC	1	24-Jun-00	17-Jul-00
	35	NE	Boston P&DC #1	MA	4	24-Jun-00	17-Jul-00
	36	NY	DVDaniels P&DC #1	NJ	2	24-Jun-00	17-Jul-00
	40	MA	Raleigh P&DC	NC	1	01-Jul-00	24-Jul-00
	41	MW	St Louis P&DC #1	MO	2	01-Jul-00	24-Jul-00
	37	NE	Hartford P&DC #2	CT		01-Jul-00	24-Jul-00
	39	SE	Nashville P&DC	TN	1	01-Jul-00	24-Jul-00
	38	SW	Tulsa P&DC #2	OK		01-Jul-00	24-Jul-00
	45	AL	Philadelphia P&DC #1	PA	2	08-Jul-00	31-Jul-00
	42	CM	Baltimore P&DC #1	MD	2	08-Jul-00	31-Jul-00
	46	NY	Kilmer P&DC	NJ	1	08-Jul-00	31-Jul-00
	43	PA	San Francisco P&DC #2	CA		08-Jul-00	31-Jul-00
	47	SW	South Annex #1	TX	2	08-Jul-00	31-Jul-00
	44	WE	Las Vegas P&DC #2	NV		08-Jul-00	31-Jul-00
	53	CM	Southern MD P&DC	MD	1	15-Jul-00	07-Aug-00
	48	GL	South Suburban P&DC	IL	1	15-Jul-00	07-Aug-00
	49	PA	Santa Ana P&DC	CA	1	15-Jul-00	07-Aug-00
	50	SE	Birmingham P&DC (Annex)	AL	1	15-Jul-00	07-Aug-00
	51	SW	Ft Worth P&DC	TX	1	15-Jul-00	07-Aug-00
	52	WE	Denver P&DC #1	CO	5	15-Jul-00	07-Aug-00

PH2 SEQ. #	PH1 SEQ. #	AREA	PLANT	ST	TOTAL UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
0	170+1+2				173	Sat, 0 day	Monday
	58	GL	Detroit P&DC #1	MI	2	22-Jul-00	14-Aug-00
	59	MA	Louisville P&DC	KY	1	22-Jul-00	14-Aug-00
	54	NE	Albany P&DC #1	NY	2	22-Jul-00	14-Aug-00
	55	NY	DVDaniels P&DC #2	NJ		22-Jul-00	14-Aug-00
	57	SE	Ft Lauderdale P&DC	FL	1	22-Jul-00	14-Aug-00
	56	WE	Mount Hood DDC #1	OR	2	22-Jul-00	14-Aug-00
	63	AL	Cincinnati P&DC #1	OH	2	29-Jul-00	21-Aug-00
	61	MW	St Louis P&DC #2	MO		29-Jul-00	21-Aug-00
	64	NE	Boston P&DC #2	MA		29-Jul-00	21-Aug-00
	60	NE	Hartford P&DC #3	CT		29-Jul-00	21-Aug-00
	65	NY	Queens P&DC #1	NY	2	29-Jul-00	21-Aug-00
	62	PA	Anaheim P&DF	CA	1	29-Jul-00	21-Aug-00
	66	AL	Philadelphia P&DC #2	PA		05-Aug-00	28-Aug-00
	70	MW	Milwaukee P&DC #3	WI		05-Aug-00	28-Aug-00
	71	MW	Milwaukee P&DC #4	WI		05-Aug-00	28-Aug-00
	68	SE	Ft Myers P&DC	FL	1	05-Aug-00	28-Aug-00
	67	SW	South Annex #2	TX		05-Aug-00	28-Aug-00
	69	WE	Las Vegas P&DC #3	NV		05-Aug-00	28-Aug-00
	75	NY	Westchester P&DC	NY	1	12-Aug-00	04-Sep-00
	73	PA	Long Beach P&DC #1	CA	2	12-Aug-00	04-Sep-00
	76	SE	Memphis P&DC	TN	1	12-Aug-00	04-Sep-00
	77	SW	Baton Rouge P&DC	LA	1	12-Aug-00	04-Sep-00
	74	SW	Dallas P&DC #1	TX	2	12-Aug-00	04-Sep-00
	72	WE	Denver P&DC #2	CO		12-Aug-00	04-Sep-00
	82	AL	Pittsburgh P&DC #1	PA	2	19-Aug-00	11-Sep-00
	78	CM	Baltimore P&DC #2	MD		19-Aug-00	11-Sep-00
	80	GL	Detroit P&DC #2	MI		19-Aug-00	11-Sep-00
	83	GL	Palatine P&DC #1	IL	1	19-Aug-00	11-Sep-00
	79	NE	Rochester	NY	1	19-Aug-00	11-Sep-00
	81	WE	Salt Lake City P&DC	UT	1	19-Aug-00	11-Sep-00
	84	AL	Cincinnati P&DC #2	OH		26-Aug-00	18-Sep-00
	85	MA	Norfolk P&DC	VA	1	26-Aug-00	18-Sep-00
	86	MW	Minneapolis P&DC	MN	1	26-Aug-00	18-Sep-00
	88	NY	Brooklyn P&DC	NY	1	26-Aug-00	18-Sep-00
	89	PA	Santa Clarita P&DC #1	CA	3	26-Aug-00	18-Sep-00
	87	SE	Tampa P&DC	FL	1	26-Aug-00	18-Sep-00
	91	MA	Richmond P&DC	VA	1	02-Sep-00	25-Sep-00
	92	NE	Boston P&DC #3	MA		02-Sep-00	25-Sep-00
	93	NY	Morgan P&DC #1	NY	4	02-Sep-00	25-Sep-00
	94	SE	Mid-Florida P&DC	FL	1	02-Sep-00	25-Sep-00
	95	WE	Denver P&DC #3	CO		02-Sep-00	25-Sep-00
	90	WE	Tucson P&DC	AZ	1	02-Sep-00	25-Sep-00
	99	AL	Columbus P&DC #1	OH	2	09-Sep-00	02-Oct-00
	100	GL	Carol Stream P&DC #1	IL	3	09-Sep-00	02-Oct-00
	101	MW	Kansas City P&DC #1	MO	2	09-Sep-00	02-Oct-00
	97	PA	Long Beach P&DC #2	CA		09-Sep-00	02-Oct-00
	98	SW	Dallas P&DC #2	TX		09-Sep-00	02-Oct-00
	96	WE	Mount Hood DDC #2	OR		09-Sep-00	02-Oct-00
	103	AL	Pittsburgh P&DC #2	PA		16-Sep-00	09-Oct-00
	107	AL	Toledo P&DC	OH	1	16-Sep-00	09-Oct-00
	104	GL	Carol Stream P&DC #2	IL		16-Sep-00	09-Oct-00
	102	NE	Providence P&DC	RI	1	16-Sep-00	09-Oct-00
	105	NE	Southern Connecticut P&DC	CT	1	16-Sep-00	09-Oct-00

PH2 SEQ. #	PH1 SEQ. #	AREA	PLANT	ST	TOTAL UNITS	AFSM 100 DELIVERY	START ACCEP TEST
5	170-112			173	SAT. 0 day	Monday	
106	NY	Western Nassau P&DC	NY	1	16-Sep-00	09-Oct-00	
112	MW	Des Moines P&DC	IA	1	23-Sep-00	16-Oct-00	
108	MW	St Paul P&DC #2	MIN		23-Sep-00	16-Oct-00	
109	PA	Santa Clara P&DC #2	CA		23-Sep-00	16-Oct-00	
110	SE	North Metro P&DC	GA	1	23-Sep-00	16-Oct-00	
111	SW	Austin P&DC #1	TX	2	23-Sep-00	16-Oct-00	
113	SW	No Houston P&DC	TX	1	23-Sep-00	16-Oct-00	
115	GL	Fox Valley P&DC	IL	1	30-Sep-00	23-Oct-00	
116	NY	Morgan P&DC #2	NY		30-Sep-00	23-Oct-00	
117	PA	M L Sellers P&DC #1	CA	2	30-Sep-00	23-Oct-00	
118	SE	Orlando AMC (adjoining P&DC)	FL	1	30-Sep-00	23-Oct-00	
119	SW	El Paso P&DC	TX	1	30-Sep-00	23-Oct-00	
114	WE	Denver P&DC #4	CO		30-Sep-00	23-Oct-00	
120	AL	Columbus P&DC #2	OH		07-Oct-00	30-Oct-00	
123	AL	South Jersey P&DC	NJ	1	07-Oct-00	30-Oct-00	
121	GL	Carol Stream P&DC #3	IL		07-Oct-00	30-Oct-00	
122	MW	Kansas City P&DC #2	MO		07-Oct-00	30-Oct-00	
124	MW	Omaha P&DC	NE	1	07-Oct-00	30-Oct-00	
125	NE	Boston P&DC #4	MA		07-Oct-00	30-Oct-00	
128	GL	Irving Park Rd P&DC	IL	1	14-Oct-00	06-Nov-00	
129	MW	Sioux Falls P&DF	SD	1	14-Oct-00	06-Nov-00	
130	NY	West Jersey P&DC	NJ	1	14-Oct-00	06-Nov-00	
126	SE	Knoxville P&DC	TN	1	14-Oct-00	06-Nov-00	
131	SE	Miami P&DC	FL	1	14-Oct-00	06-Nov-00	
127	WE	Seattle P&DC #1	WA	3	14-Oct-00	06-Nov-00	
135	AL	Delaware P&DC	DE	1	21-Oct-00	13-Nov-00	
136	GL	Lansing P&DC	MI	1	21-Oct-00	13-Nov-00	
137	MW	Wichita P&DC	KS	1	21-Oct-00	13-Nov-00	
132	PA	Santa Clara P&DC #3	CA		21-Oct-00	13-Nov-00	
133	SW	Austin P&DC #2	TX		21-Oct-00	13-Nov-00	
134	WE	Seattle P&DC #2	WA		21-Oct-00	13-Nov-00	
142	GL	Grand Rapids Annex	MI	1	28-Oct-00	20-Nov-00	
143	MW	Madison P&DC	WI	1	28-Oct-00	20-Nov-00	
139	PA	M L Sellers P&DC #2	CA		28-Oct-00	20-Nov-00	
140	PA	Oakland P&DC	CA	1	28-Oct-00	20-Nov-00	
141	SW	North Texas P&DC #1	TX	2	28-Oct-00	20-Nov-00	
138	WE	Rio Salado MPO #1	AZ	2	28-Oct-00	20-Nov-00	
149	AL	Dayton P&DC	OH	1	04-Nov-00	27-Nov-00	
145	CM	Suburban MD P&DC	MD	1	04-Nov-00	27-Nov-00	
146	NY	Morgan P&DC #3	NY		04-Nov-00	27-Nov-00	
147	SE	West Palm Beach P&DC	FL	1	04-Nov-00	27-Nov-00	
148	SW	Waco P&DF	TX	1	04-Nov-00	27-Nov-00	
144	WE	Seattle P&DC #3	WA		04-Nov-00	27-Nov-00	
155	AL	Southeastern P&DC	PA	1	11-Nov-00	04-Dec-00	
151	GL	Royal Oak P&DC #1	MI	2	11-Nov-00	04-Dec-00	
153	NE	Albany P&DC #2	NY		11-Nov-00	04-Dec-00	
152	NY	Monmouth P&DC	NJ	1	11-Nov-00	04-Dec-00	
154	SE	Montgomery P&DC	AL	1	11-Nov-00	04-Dec-00	
150	WE	Rio Salado MPO #2	AZ		11-Nov-00	04-Dec-00	
159	MW	Fargo P&DC	ND	1	18-Nov-00	11-Dec-00	
156	MW	Kansas City (KS) P&DC	KS	1	18-Nov-00	11-Dec-00	
161	NE	Brockton P&DC	MA	1	18-Nov-00	11-Dec-00	
158	NY	Queens P&DC #2	NY		18-Nov-00	11-Dec-00	

PH2 SEQ. #	PH1 SEQ. #	AREA	PLANT	ST	TOTAL UNITS	AFSM 100 DELIVERY	START ACCEPT TEST
170+1+2					173	Est. 0 day	Monday
157	PA	Bakersfield P&DC		CA	1	18-Nov-00	11-Dec-00
160	PA	San Jose P&DC #1		CA	2	18-Nov-00	11-Dec-00
166	AL	Akron P&DC		OH	1	25-Nov-00	18-Dec-00
167	AL	Hartburg P&DC #2		PA		25-Nov-00	18-Dec-00
164	SE	Manasota P&DC		FL	1	25-Nov-00	18-Dec-00
163	SW	North Texas P&DC #2		TX		25-Nov-00	18-Dec-00
162	WE	Denver P&DC #5		CO		25-Nov-00	18-Dec-00
165	WE	East Valley DDC		AZ	1	25-Nov-00	18-Dec-00
2001	4a	HQ	NCED Training Unit #1	OK	2	02-Dec-00	18-Dec-00
2002	5a	HQ	NCED Training Unit #2	OK		02-Dec-00	18-Dec-00
172	NE	Manchester P&DC		NH	1	02-Dec-00	20-Dec-00
168	NY	Morgan P&DC #4		NY		02-Dec-00	20-Dec-00
170	PA	San Bernardino P&DC		CA	1	02-Dec-00	20-Dec-00
171	SE	South Florida P&DC		FL	1	02-Dec-00	20-Dec-00
2003	169	HQ	MTSC - Resource	OK	1	09-Dec-00	03-Jan-01
2004	173	MA	Royal Oak P&DC	NC	1	09-Dec-00	10-Jan-01
174	GL	Royal Oak P&DC #2		MI		06-Jan-01	29-Jan-01
2007	2a	MA	North Park Annex (P&DC)	NC	1	06-Jan-01	29-Jan-01
2006	1a	NE	Springfield P&DC	MA	1	06-Jan-01	29-Jan-01
2005	175	PA	San Jose P&DC #2	CA		06-Jan-01	29-Jan-01
2008	3a	SE	Chattanooga P&DC	TN	1	06-Jan-01	29-Jan-01
	S	HQ	Engineering - Simulator	VA	0	24-Nov-01	24-Nov-01
	S	HQ	MTSC - Simulator	OK	0.5	24-Nov-01	24-Nov-01
8	175				173		

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

DMA/USPS-T-39-19 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?

RESPONSE:

- (a) – (c) There are no plans at this time.

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

DMA/USPS-T-39-20 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.

RESPONSE:

- a) Yes.
- b) Approximately an 8 percent increase.
- c) Conversion of production line units 8/6/2001.
Retrofits scheduled for completion 11/19/2001.
- d) Deployment schedule:

Site	Scheduled Ship Date	Scheduled Install Date
Akron	8/7/01	9/6/01
Albany	7/31/01	8/30/01
Albuquerque	9/7/01	10/7/01
Anaheim	8/21/01	9/20/01
Anchorage	8/3/01	9/2/01
Asheville	10/13/01	11/12/01
Atlanta	8/7/01	9/6/01
Austin	8/28/01	9/27/01
Bakersfield	9/4/01	10/4/01
Baltimore	8/3/01	9/2/01
Baton Rouge	8/3/01	9/2/01
Birmingham	8/17/01	9/16/01
Boise	9/11/01	10/11/01
Boston	8/14/01	9/13/01
Brockton	9/4/01	10/4/01
Brooklyn	8/24/01	9/23/01
Buffalo	8/7/01	9/6/01

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

Carol Stream	8/28/01	9/27/01
Central Mass	9/11/01	10/11/01
Central WI	9/11/01	10/11/01
Charleston P&DC	9/29/01	10/29/01
Charleston P&DF	10/20/01	11/19/01
Charlotte	7/27/01	8/26/01
Charlottesville	7/31/01	8/30/01
Chattanooga	9/7/01	10/7/01
Chicago Central	8/10/01	9/9/01
Cincinnati	8/21/01	9/20/01
Cleveland	8/10/01	9/9/01
Colorado Springs	9/22/01	10/22/01
Columbia	8/7/01	9/6/01
Columbus	7/27/01	8/26/01
Corpus Christi	9/11/01	10/11/01
Dallas	8/3/01	9/2/01
Dayton	9/4/01	10/4/01
Delaware	7/31/01	8/30/01
Denver	8/17/01	9/16/01
Depot	8/7/01	9/6/01
Des Moines	7/27/01	8/26/01
Detroit	7/27/01	8/26/01
Dulles	8/7/01	9/6/01
DV Daniels	8/14/01	9/13/01
East King County DDC	9/29/01	10/29/01
East Valley	9/4/01	10/4/01
El Paso	8/31/01	9/30/01
Erie	7/31/01	8/30/01
Eugene	7/27/01	8/26/01
Everett	9/7/01	10/7/01
Fargo	9/4/01	10/4/01
Fayetteville	8/7/01	9/6/01
Fox Valley	8/31/01	9/30/01
Frederick	7/27/01	8/26/01
Fresno	9/22/01	10/22/01
Ft Lauderdale	8/21/01	9/20/01
Ft Myers	8/21/01	9/20/01
Ft Worth	8/17/01	9/16/01
Gainesville	10/13/01	11/12/01
Gary	7/27/01	8/26/01
Grand Rapids	8/7/01	9/6/01
Green Bay	10/20/01	11/19/01
Greensboro	9/7/01	10/7/01
Greenville	8/14/01	9/13/01
Hackensack	8/3/01	9/2/01
Harrisburg	8/7/01	9/6/01
Hartford	8/10/01	9/9/01
Indianapolis	8/10/01	9/9/01
Industry	8/7/01	9/6/01

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

Irving Park Rd	8/3/01	9/2/01
Jackson	8/3/01	9/2/01
Jacksonville	8/14/01	9/13/01
JAF P&DC	9/22/01	10/22/01
Johnstown	7/31/01	8/30/01
Kalamazoo	7/31/01	8/30/01
Kansas City KS	9/4/01	10/4/01
Kansas City MO	8/7/01	9/6/01
Kilmer	8/7/01	9/6/01
Knoxville	8/31/01	9/30/01
Lancaster	9/7/01	10/7/01
Lansing	8/31/01	9/30/01
Las Vegas	8/14/01	9/13/01
Lehigh Valley	9/7/01	10/7/01
Lexington	9/11/01	10/11/01
Linthicum	9/7/01	10/7/01
Long Beach	8/21/01	9/20/01
Los Angeles	9/7/01	10/7/01
Louisville	8/21/01	9/20/01
Macon Annex	9/29/01	10/29/01
Madison	9/4/01	10/4/01
Manasota	9/4/01	10/4/01
Manchester	7/27/01	8/26/01
Marina	7/31/01	8/30/01
Memphis	8/3/01	9/2/01
Miami	8/31/01	9/30/01
Mid-Florida	7/31/01	8/30/01
Mid-Hudson	9/11/01	10/11/01
Mid-Island	7/27/01	8/26/01
Milwaukee	8/14/01	9/13/01
Minneapolis	7/31/01	8/30/01
ML Sellers	8/31/01	9/30/01
Monmouth	9/4/01	10/4/01
Montgomery	9/4/01	10/4/01
Morgan	8/3/01	9/2/01
Mount Hood	8/21/01	9/20/01
MTSC	9/7/01	10/7/01
Nashville	8/17/01	9/16/01
NCED Training	8/17/01	9/16/01
New Castle	7/27/01	8/26/01
New Orleans	9/11/01	10/11/01
Newark	10/6/01	11/5/01
NJI BMC	9/11/01	10/11/01
Norfolk	8/24/01	9/23/01
North Bay	9/22/01	10/22/01
North Houston	8/28/01	9/27/01
North Metro	8/28/01	9/27/01
North Park Annex	9/7/01	10/7/01
North Texas	9/4/01	10/4/01

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

North Valley	9/11/01	10/11/01
North Virginia	8/14/01	9/13/01
Northwest Annex	9/7/01	10/7/01
NW Boston	8/7/01	9/6/01
Oakland	7/27/01	8/26/01
Oklahoma City	9/11/01	10/11/01
Omaha	7/31/01	8/30/01
Orlando	8/31/01	9/30/01
Palatine	8/3/01	9/2/01
Paterson	7/27/01	8/26/01
Philadelphia	7/27/01	8/26/01
Pittsburgh	8/24/01	9/23/01
Portland	9/11/01	10/11/01
Providence	8/28/01	9/27/01
Queens	8/21/01	9/20/01
Raleigh	8/17/01	9/16/01
Reading	9/11/01	10/11/01
Reno	7/27/01	8/26/01
Richmond	8/24/01	9/23/01
Rio Salado	8/7/01	9/6/01
Roanoke	9/11/01	10/11/01
Rochester	8/24/01	9/23/01
Rockford	9/29/01	10/29/01
Royal Oak	8/10/01	9/9/01
Sacramento	9/7/01	10/7/01
Salem	10/6/01	11/5/01
Salt Lake City	8/3/01	9/2/01
San Bernadino	8/3/01	9/2/01
San Francisco	8/14/01	9/13/01
San Jose	7/27/01	8/26/01
San Juan	9/11/01	10/11/01
Santa Ana	8/17/01	9/16/01
Santa Clarita	8/24/01	9/23/01
Seattle	8/3/01	9/2/01
Shreveport	7/31/01	8/30/01
Sioux Falls	8/31/01	9/30/01
South Annex	8/17/01	9/16/01
South Florida	9/7/01	10/7/01
South Jersey	8/31/01	9/30/01
South Suburban	7/31/01	8/30/01
Southeastern	9/4/01	10/4/01
Southern Connecticut	8/28/01	9/27/01
Southern MD	8/3/01	9/2/01
Spokane	8/10/01	9/9/01
Springfield MA	9/7/01	10/7/01
Springfield MO	9/7/01	10/7/01
St Louis	8/17/01	9/16/01
St Paul	8/7/01	9/6/01
St Petersburg	10/6/01	11/5/01

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

Stamford	7/31/01	8/30/01
Stockton	10/13/01	11/12/01
Suburban MD	9/4/01	10/4/01
Syracuse	7/31/01	8/30/01
Tampa	8/24/01	9/23/01
Toledo	8/28/01	9/27/01
Trenton	9/11/01	10/11/01
Troyhill Training	8/17/01	9/16/01
Tulsa	8/14/01	9/13/01
Tuscon	8/24/01	9/23/01
Waco	9/4/01	10/4/01
Washington DC	8/14/01	9/13/01
West Jersey	8/31/01	9/30/01
West Palm Beach	8/3/01	9/2/01
Westchester	8/24/01	9/23/01
Western Nassau	8/28/01	9/27/01
Wichita	7/31/01	8/30/01

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

DMA/USPS-T-39-21 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?

RESPONSE:

- a. The goal is all facilities.
- b. Approximately 75 facilities.
- c. The goal is to have no facilities with one or more AFSM 100s and one or more FSM 881s.
- d. Approximately 65 facilities.

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

DMA/USPS-T-39-22 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?

RESPONSE:

- (a) and (b) I do not know. It would depend on the level of presort.
- (c) Once is usually sufficient.
- (d) LMLM, MPBCS and DBCS OSS productivities are in LR-J-56, sponsored by witness Bozzo (USPS-T-14).
- (e) Level 4s for both functions.

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

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?

RESPONSE:

- (a) See response to DMA/USPS-T39-8.
- (b) It is expected that there will be a corresponding increase in productivity associated with the expected increase in throughput.
- (c) The productivity is projected to be 1,140 pieces per workhour.
- (d) In AP 01, FY 02, 95.5% of the pieces were manually keyed.
- (e) In AP 01, FY 02, the average productivity of all keying operations on the FSM 1000s was 448.
- (f) There are no productivity data available for FSM 1000s with OCRs, since none have yet been deployed.

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

DMA/USPS-T-39-24 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.

RESPONSE:

See response to AOL-TW/USPS-1 for TPH and TPF data for FY 2000. See response to DMA/USPS-T39-5 for information related to FY 2003.

DECLARATION

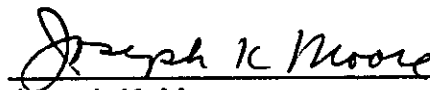
I, Linda A. Kingsley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Linda A. Kingsley
LINDA A. KINGSLEY

Dated: 11/08/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 8, 2001