

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DOUGLAS F. CARLSON  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PHILIP A. HATFIELD  
(DFC/USPS-T16-1-2)

August 4, 1997


Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Philip A. Hatfield.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: August 4, 1997

  
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DOUGLAS F. CARLSON

**DFC/USPS-T16-1.** Please refer to the four types of mail described in (I) through (IV) below. (For this interrogatory, the term "standard-sized" mail refers to mail that is not subject to a nonstandard surcharge under DMM § C100.3.0.)

I. Typewritten, one-ounce, standard-sized, first-class letters whose address information (1) can be read completely by an Optical Character Reader (OCR) without assistance from the Remote Bar Code System (RBCS) and (2) is sufficiently accurate and complete to allow the highest level of bar code (i.e., 5-digit, 9-digit, or delivery-point) desired for that address to be applied to the envelope?

II. Typewritten, one-ounce, standard-sized, first-class letters whose address information (1) can be read completely by an Optical Character Reader (OCR) without assistance from the Remote Bar Code System (RBCS) but (2) is sufficiently accurate and complete to allow only a bar code that is inferior to the highest level of bar code (i.e., 9-digit, or delivery-point) desired for that address to be applied to the envelope?

III. One-ounce, standard-sized, First-class letters whose address information (1) can be read completely by an Optical Character Reader (OCR) with assistance only from the Remote Computer Reader (RCR) portion of the Remote Bar Code System (RBCS) and (2) is sufficiently accurate and complete to allow the highest level of bar code (i.e., 5-digit, 9-digit, or delivery-point) desired for that address to be applied to the envelope?

IV. One-ounce, standard-sized, first-class letters whose address information cannot be read completely by an Optical Character Reader (OCR) and, therefore, requires assistance from a Data Conversion Operator via the Remote Bar Code System (RBCS) in order to allow the highest level of bar code (i.e., 5-digit, 9-digit, or delivery-point) desired for that address to be applied to the envelope?

a. Please confirm that the types of mail described in (I) through (IV) are identical to the four types of mail described in DFC/USPS-T32-2(a)–(d).

b. Please confirm that the following ranking accurately reflects the ranking from least costly to most costly of the processing costs of each type of mail, all else being equal, at a fully automated P&DC. If you do not confirm, please explain in detail and provide the correct ranking whenever you can compare at least two types of mail.

1. Type I
2. Type II
3. Type III
4. Type IV

**DFC/USPS-T16-2.**

a. Please confirm that a cost is associated with involving an RBCS Data Conversion Operator in the sortation of a piece of mail. If you do not confirm, please explain fully.

b. All else being equal, please confirm that the cost of processing a piece of mail with the involvement of a Data Conversion Operator is higher than the cost of processing a similar piece of mail without the involvement of a Data Conversion Operator. If you do not confirm, please explain fully.

c. Please explain how, in your response to DFC/USPS-T32-3(a), the mail-processing costs associated with the mail described in part (a) of DFC/USPS-T32-2 could be the same as the mail-processing costs associated with the mail described in part (d) of DFC/USPS-T32-2.

d. In your response to DFC/USPS-T32-3(a), you noted that “Because the type (a) mail is never sent through the RBCS, it may avoid certain mail processing costs that are incurred by the type (d) mail.” Please confirm that

because the type (a) mail is not sent through RBCS, it will avoid certain mail-processing costs that are incurred by the type (d) mail.

e. If you confirm in part (d), please provide examples of the types of costs that the type (a) mail would avoid.

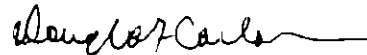
f. If you do not confirm in part (d), please explain your answer fully.

g. In general, does the Postal Service prefer typewritten mail over handwritten ("script") mail? If so, is this preference related to the generally lower processing costs of typewritten mail over handwritten mail?

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### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

August 4, 1997  
Emeryville, California