

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORY OF TIME WARNER, INC. (TW/USPS-T4-12)
AND MOTION FOR EXTENSION OF TIME TO RESPOND TO TW/USPS-T4-13-16

The United States Postal Service hereby provides the response of witness Moden to the following interrogatory of Time Warner, Inc.: TW/USPS-T4-12, filed on August 4, 1997. The interrogatory is stated verbatim and is followed by the response.

The Postal Service also moves for an extension of time to respond to interrogatories TW/USPS-T4-13-16, filed on August 4. Preparing responses to these interrogatories has required querying and in some cases the collection and analysis of numerous documents or information sources. This effort has not been completed as of today, although only one additional day should be necessary to do so. Counsel for Time Warner has indicated to undersigned counsel that he does not object to an extension of one day.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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August 18, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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TW/USPS-T4-12 Please answer the following questions regarding
current and future use of flat sorting machines.

- a. Can an FSM 881 without OCR be used simultaneously both in the BCR and manual keying mode? If yes, explain how this is done, if no, explain why not and what is involved in switching from one mode to another.
- b. On OCR equipped FSM 881's, will barcoded and non-barcoded flats sometimes be fed at the same time? If yes, please discuss any problems that might result from mixing barcoded and non-barcoded flats in the output stream.
- c. Will OCR equipped FSM's sometimes be used with OCR reading of some flats while others are keyed manually, at the same time?
- d. When an FSM 881 has been equipped with an OCR, will that FSM still be used in a manual keying mode? If yes, describe the conditions under which this is expected to occur.
- e. If a mixture of barcoded and non-barcoded flats are fed to an FSM-OCR, will it automatically use the OCR on the non-barcoded flats and the BCR on the barcoded flats, or will the operator need to select one mode or the other? Please explain.

Response:

- a. Yes. The FSM 881 has four consoles. Operators pick up flats from a feed table belt and induct them onto an induction belt. Each console functions independently of the other three and can be set up for either keyed or BCR mode.
- b. Yes. No problems are expected in the output stream.
- c. Yes.
- d. Yes. The FSM could be used to process OCR read rejects.

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- e. As I mentioned on page 14, lines 14 through 18, of my testimony, the Flat Mail OCR (FMOCR) will work in conjunction with the existing barcode reader. If a barcode is found, the piece will be sorted based on the barcode. If a barcode is not found, the piece will be sorted based on the address information read by the FMOCR. The operator will not have to select OCR versus BCR mode.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J Moden

Dated: 8/18/97

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.

A handwritten signature in black ink, appearing to read "Scott Reiter", written over a horizontal line.

Scott L. Reiter

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