

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
INTERROGATORIES OF NASHUA PHOTO INC. ET AL.
REDIRECTED FROM WITNESSES CRUM AND FRONK
(NDMS/USPS-T28-15 & 16; T32-18, 21 & 23)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc., filed on August 8, 1997: NDMS/USPS-T28-15 & 16, redirected from witness Crum; and T32-18, 21 & 23, redirected from witness Fronk.

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



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August 20, 1997

**U.S. POSTAL SERVICE WITNESS RALPH J. MODEN
RESPONSE TO INTERROGATORIES OF NDMS
REDIRECTED FROM WITNESS CRUM**

NDMS/USPS-T28-15.

- a. What is the standard staffing configuration for an SPBS?
- b. What is the average number of pieces processed per person-hour on an SPBS without a barcode reader?
- c. What is the average number of pieces processed per person-hour on an SPBS with a barcode reader?
- d. What is the maximum number of sortations on a typical SPBS?

RESPONSE

- a. The staffing configuration varies depending on whether an SPBS has four or six keying stations. Also, the type of mail being ran on the SPBS can affect staffing needs.

Generally, an SPBS requires two employees - one to key and one to feed mail - for each keying station that is being operated. The amount of employees needed to sweep the machine can also vary, but generally two are used on each side of the machine.
- b. See, for examples, the testimony of witness Garvin (USPS-T-3) in docket MC96-1.
- c. See, for examples, the testimony of witness Garvin (USPS-T-3) in docket MC96-1.
- d. The SPBS has 100 sort separations and one reject separation.

**U.S. POSTAL SERVICE WITNESS RALPH J. MODEN
RESPONSE TO INTERROGATORIES OF NDMS
REDIRECTED FROM WITNESS CRUM**

DMS/USPS-T28-16.

- a. What is the standard staffing configuration on an FSM 1000?
- b. What is the average number of pieces processed per person-hour on an FSM 1000 without a barcode reader?
- c. What is the average number of pieces expected to be processed per hour on an FSM 1000 with a barcode reader?
- d. *What is the maximum number of sortations on a typical FSM 1000?*

RESPONSE

- a. The standard staffing configuration on the FSM 1000 is six employees.
- b. See library reference USPS LR-H-169.
- c. See library reference USPS LR-H-169.
- d. An FSM 1000 has 99 sort separations and one reject separation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.
REDIRECTED FROM WITNESS DAVID R. FRONK

NDMS/USPS-T32-18

- a. Are First-Class flats processed on automated equipment; i.e., on flat sorting machines such as the FSM 881 or the FSM 1000? If so, at P&DCs where FSMs are available, are First-Class flats routinely given (i) outgoing primary, (ii) outgoing secondary, (iii) incoming primary, and/or (iv) incoming secondary sortation on automated equipment?

- b. Can First-Class flats that weigh less than one ounce be processed on FSMs? (ii) Sometimes? (iii) Always? (iv) Never? (v) If not, please specify how flats that weigh less than one ounce are segregated and processed.

Response:

- a. Yes, First-Class flats are processed on flat sorting machines such as the FSM 881 or the FSM 1000. However, although the FSM 881 does have a barcode reader, flat sorters by definition are considered mechanized equipment and are generally not referred to as automated equipment. With that in mind, First-Class flats are routinely given outgoing primary, outgoing secondary, incoming primary, and/or incoming secondary on mechanized flat sorters.

- b. Yes, as long as the flat meets all of the other machinability requirements. However, it is my understanding that many of the flats that are under one ounce have difficulty meeting the other machinability requirements such as rigidity.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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REDIRECTED FROM WITNESS DAVID R. FRONK

NDMS/USPS-T32-21

In today's automated environment, including remote barcoding, please explain the type of letters that routinely would receive manual processing.

Response:

The types of letters that routinely would receive manual processing throughout the system or at certain locations are listed below.

- (1) Non Machinable.
- (2) Remote Barcoding System Rejects.
- (3) Letters destined for zones that have fewer than five carriers.
- (4) Letters that originated and/or destined in the same non-automated facility.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.
REDIRECTED FROM WITNESS DAVID R. FRONK

NDMS/USPS-T32-23

a. Can two-ounce letters be processed on the Postal Service's automation equipment?

Response:

Yes, assuming all other machinability requirements are also met.

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: 8/20/97

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 cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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August 20, 1997