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

POSTAL RATE AND FEE CHANGES, 1997) Docket No. R97-1

NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS RALPH J. MODEN (NDMS/USPS-T4-1-15)
(August 22, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Nashua Photo Inc. (hereinafter "Nashua"), District Photo Inc. ("District"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") (hereinafter collectively referred to as "NDMS"), proceeding jointly herein, hereby submit the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

William J. Olson

August 22, 1997

NDMS/USPS-T4-1.

a. What is the total number of Small Parcel and Bundle Sorter (SPBS) machines (i) currently deployed, and (ii) on order?

b. At the present time, is the Postal Service contemplating ordering more SPBS machines?

c. If deployment of SPBS machines is not yet complete, when will all machines currently on order be deployed?

NDMS/USPS-T4-2.

In Docket No. MC96-1, the Postal Service indicated that it had retrofitted a small number of SPBS machines with barcode readers, and that such readers enabled the Postal Service to process barcoded parcels more efficiently and at lower unit cost. Does the Postal Service currently have any plans to retrofit more SPBS machines with barcode readers?

a. If so, please indicate the number of retrofit kits that the Postal Service expects to (i) order and (ii) deploy by the end of Test Year.

b. If not, please explain why the Postal Service is not expanding barcoding/automation/mechanization, with the greater efficiency which that entails, to small parcels processed on SPBS machines.

NDMS/USPS-T4-3.

a. When all SPBS machines currently on order are fully deployed, how many Postal Service facilities then will have an SPBS but not have an FSM 1000?

b. When all FSM 1000s currently on order are fully deployed, how many Postal Service facilities then will have an FSM 1000 but not have an SPBS?

NDMS/USPS-T4-4.

For purposes of responding to this interrogatory, assume that some mailers of Standard A parcels prefer to bypass the BMC and, in consequence thereof, dropship their parcels and enter them at DSCFs. Assume further that (i) the size and shape of the parcels comport with all requirements for the FSM 1000 described in your response to TW/USPS-T4-5(f) (*i.e.*, they are capable of being processed on the FSM 1000), and (ii) the SCF has available capacity on both its FSM 1000(s) and its SPBS(s).

a. On which machine would the Standard A parcels most likely be processed?

b. Under what circumstances or conditions would the parcels likely be processed on the FSM 1000?

NDMS/USPS-T4-5.

Does the Standard A mailstream contain any types of parcels that cannot be processed on an SPBS? If your answer is affirmative, please refer to the attachment to RIAA/UUSPS-T7-4 in Docket No. MC97-2, and explain fully the types of parcels not amenable to processing on a SPBS, using the categories shown there (*i.e.*, (i) CD Box, (ii) video box, (iii) check box, (iv) other box, (v) other, (vi) film envelope, (vii) roll tube, (viii) clothing bag, (ix) prescription drug, and (x) sample).

NDMS/USPS-T4-6.

When all FSM 1000s currently on order are fully deployed, will the Standard A mailstream contain any flats that cannot be processed on either an FSM 881 or an FSM 1000? Please explain fully any affirmative answer.

NDMS/USPS-T4-7.

Does the Postal Service have under development a high speed flat feeder (HSFF) for the FSM 1000? Please explain Postal Service plans and timetables for this feeder.

NDMS/USPS-T4-8.

a. What is (i) the average, and (ii) the maximum throughput of an SPBS without a barcode reader?

b. What is (i) the average and (ii) the maximum throughput of an SPBS with a barcode reader?

c. What size crew is required to obtain the maximum throughput on an SPBS?

NDMS/USPS-T4-9.

How does the unit cost of processing parcels on an SPBS (when operated in a keying mode) compare with the unit cost of processing machinable pieces (flats or parcels) on an FSM 1000 (when operated in a keying mode)?

NDMS/USPS-T4-10.

What is the cost of retrofitting an SPBS with a barcode reader?

NDMS/USPS-T4-11.

Please refer to your response to DMA/USPS-T4-13, in which you point out that the Postal Service has also proposed a parcel barcoding discount in Standard B to incent [sic] even more precoded parcels from mailers." Why has the Postal Service not proposed a similar discount for parcels in Standard A?

NDMS/USPS-T4-12.

Your response to NDMS/USPS-T32-18 (redirected from Witness Fronk) states that First-Class flats which weigh less than one ounce can be processed on FSM 881s and FSM 1000s provided they meet all other machinability requirements.

a. Prior to processing, does the Postal Service routinely and systematically attempt to cull out from the First-Class mailstream (i) flats that weigh less than one ounce or (ii) "flimsies" (and other nonmachinabies) regardless of weight, or does the Postal Service put all flats on the machine and let the machine divert the nonmachinable pieces to the reject stacker?

b. Of the First-Class flat mail pieces that weigh less than one ounce, what percentage would generally be nonmachinable?

NDMS/USPS-T4-13.

Please refer to (i) your response to TW/USPS-T4-5(f) in this docket and (ii) your Docket No. MC97-2, response to NDMS/USPS-T13-1, and:

a. Confirm that the FSM is capable of sorting pieces defined by the DMM as "nonletters" and "nonflats."

b. Confirm that the minimum length for a letter is 5 inches and the minimum length for a flat is 6 inches, while the minimum length for a piece sorted on the FSM 1000 is 3.94 inches.

c. Confirm that the maximum length for a flat is 15 inches, while the maximum length for the a piece sorted on the FSM 1000s 15.75 inches.

d. Confirm that the maximum thickness for a flat is 0.75 inches, while the maximum thickness for a piece sorted on the FSM 1000 is 1.25 inches.

e. Has the Postal Service adopted any policy, guideline or standard operating procedure that precludes the processing of Standard A parcels on the FSM 1000 if such parcels conform to (i) the minimum and maximum size dimensions provided in your response to TW/USPS-T4-5(f) and (ii) any other packaging requirements that may be necessary for machinability? If so, please (i) state when such policy, guideline or standard operating procedure was issued, (ii) provide a copy, and (iii) explain all reasons why Standard A parcels that are capable of being processed on the FSM 1000 are precluded from such application.

NDMS/USPS-T4-14.

Your response to NDMS/USPS-T32-18 (redirected from Witness Fronk) says that "flat sorters by definition are considered mechanized equipment and are generally not referred to as automated equipment."

a. When an FSM 881 is equipped with an HSFF and an OCR/barcode reader, will it still be considered mechanized equipment and generally not referred to as automated equipment? Please explain what distinguishes mechanized

equipment from automated equipment.

b. Does the Postal Service have under development a flat sorter that could be considered automated equipment? Please explain any answer that is not an unqualified negative.

NDMS/USPS-T4-15.

What is the productivity (in terms of either pieces per hour or pieces per hour per operator) for an FSM 881 when operated (i) manually and (ii) with a barcode reader?