

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE AND FEE CHANGES, 1997

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

**DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL W. MILLER
(DFC/USPS-T23-1-9)**

August 25, 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 Michael W. Miller.

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 25, 1997



DOUGLAS F. CARLSON

FOR EACH QUESTION, WHENEVER YOU RESPOND IN THE NEGATIVE OR DO NOT CONFIRM, PLEASE EXPLAIN YOUR ANSWER.

DFC/USPS-T23-1.

- a. Please confirm that some mail will reject from the MPBCS-OSS because the RBCS ID tag did not print properly on the reverse side of the mail piece.
- b. Please confirm that a slick or glossy surface on the reverse side of a mail piece is one reason why the RBCS ID tag might not print properly on a mail piece.
- c. Please confirm that the mail described in part (a) may be directed to an LMLM so that a label can be applied to the reverse side of the mail piece.
- d. Of the mail described in part (a) that is directed to an LMLM, please estimate the percentage that is successfully processed through RBCS thereafter.
- e. Please estimate the percentage of the mail described in part (a) that is directed to a manual sorting operation instead of an LMLM or that is directed to an LMLM but cannot subsequently be processed successfully through RBCS (and then is directed to a manual sorting operation).

DFC/USPS-T23-2. Please refer to your testimony at pages 4-5.

- a. Of the MPBCS-OSS rejects that are due to verifier errors for the Postnet bar code, please estimate the percentage of this mail that is directed to an LMLM machine and is successfully processed through RBCS thereafter.
- b. Please confirm that not all MPBCS-OSS mail that rejected because of verifier errors can be processed on the LMLM in the late hours of an operation due to processing windows and dispatch schedules.
- c. Please confirm that some verifier errors are caused by glossy or slick surfaces on mail pieces that prevent successful application of the Postnet bar code directly onto the surface of the mail pieces.
- d. Please confirm that some verifier errors on picture post cards of the type that people send while they are on vacation are caused when handwriting encroaches on the bar-code clear area.

DFC/USPS-T23-3.

a. Please confirm that some mail has a surface texture that is glossy or slick enough to require the mail piece to be routed to an LMLM to apply a label on both the front side and reverse side of the mail piece.

b. Please confirm that the situation described in part (a) normally occurs after the mail piece makes at least two passes through the MPBCS-OSS — that is, on one pass the problem with applying an RBCS ID tag is encountered, and on another pass the problem with spraying a Postnet bar code is encountered.

c. Please confirm that glossy picture post cards of the type that people send while they are on vacation often must be routed to an LMLM to apply a label on both the front side and reverse side of the mail piece.

DFC/USPS-T23-4.

a. Please describe the characteristics, including surface texture, size, and type (i.e., card or letter), of the mail that often is routed to an LMLM.

b. Are cards represented at the LMLM in a proportion greater than their proportion in the entire automated mail stream?

c. Of all the mail that is diverted from RBCS to manual sorting operations, are cards diverted in a greater proportion than their proportion in the entire automated mail stream?

DFC/USPS-T23-5.

a. Please estimate the percentage increase in processing cost each time a mail piece must be routed to an LMLM. This cost should include the extra pass or passes that this mail must make through an MLOCR-ISS or MPBCS-OSS after the label is applied.

b. All else being equal, to the extent that customers who presently prepare mail that must be processed on an LMLM at least once instead prepared their mail in a

manner that obviated the need to route that mail to an LMLM, would processing costs for that mail decline?

DFC/USPS-T23-6. Please confirm that the flimsiness of some private post cards sometimes causes problems for automated processing.

DFC/USPS-T23-7. Please confirm that the color or reflectance of the card stock used for private post cards sometimes causes problems for automated processing.

DFC/USPS-T23-8. Comparing stamped cards with private post cards, please confirm that private post cards are less likely than stamped cards to cause processing problems for the OCR or RBCS that are due to extraneous matter in the bar-code clear zone or the OCR read area.

DFC/USPS-T23-9. Comparing stamped cards with private post cards, please confirm that stamped cards, on average, pose fewer obstacles to automated processing than private post cards and, therefore, can be processed at a lower cost than private post cards.

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 25, 1997
Emeryville, California