

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

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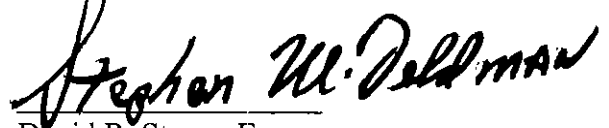
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POSTAL RATE AND FEE CHANGES, 1997  
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SEP 5 3 02 PM '97  
Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

THE AMERICAN BUSINESS PRESS' FOLLOW-UP  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO USPS WITNESS MODEN  
(ABP/USPS-T4-16-19)

Pursuant to Special Rules of Practice Section 2D, the American Business Press hereby submits the attached follow-up interrogatories and requests for production of documents to USPS Witness Taufique (ABP/USPS-T4-16-19). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

  
Stephen M. Feldman

Dated: September 5, 1997

FOLLOW-UP INTERROGATORIES  
OF AMERICAN BUSINESS PRESS (ABP)  
TO USPS WITNESS MODEN (USPS-T4)

ABP/USPS-T4-16

USPS has filed an objection to ABP/USPS-T-4-3, which requests identification of all "Operations Models" referred to by Witness Moden in the introduction to his testimony. The USPS objection is based primarily on the reference to the requested models in the witness' biographical statement, and not in his substantive testimony. ABP will re-phrase the interrogatory, and requests a response to the re-phrased question as follows:

[a] Are any of the Operations Models referred to by Witness Moden in the introduction to his direct testimony the subject of his substantive testimony ?

[b] If one or more models are discussed in T-4, please identify these models and the pages in the testimony where they appear.

ABP/USPS-T4-17

[a] In light of the failure of Witness Moden to confirm the accuracy of the summary of USPS automation regulations as originally stated in ABP/USPS-T4-4(a), what was the minimum percentage of pieces in an automation mailing of flat shaped periodicals required to bear accurate nine-digit zip codes *prior* to July 1, 1996?

[b] Identify the effective date of these pre- July 1, 1996 regulations.

ABP/USPS-T4-18

[a] Please produce any circulars, directives, regulations or written USPS policies that describe the "normal acceptance procedures" to which you refer in your response to ABP/USPS-T4-4[b].

[b] Also as a follow-up question to your response to ABP/USPS-T4-4[b] referred to in [a], does USPS currently "allow some tolerance for all types of errors, including absence of a zip plus 4 or delivery unit barcode in a flat-size automation mailing, before assessing postage at higher rates" ?

ABP/USPS-T4-19

[a] In reference to your original response to ABP/USPS-T4-12[b], has the field testing of barcode readers on the FSM 1000 begun?

[b] If your response to [a] is affirmative, when did the testing begin, and where are the tests being conducted?

[c] Please provide notice when the "formal recommendation" to the Governors to purchase and deploy bar code readers for the FSM 1000, to which you refer to in ABP/USPS-T4-12[b], occurs.