

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

RECEIVED

Nov 13 2 19 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KINGSLEY
(POSTCOM/USPS-T-39-19)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kingsley: PostCom/USPS-T-39-19.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

November 13, 2001

POSTCOM/USPS-T39-19. Your answer to DMA/USPS-T-39-3 recites that an “average number of AFSM100 run hours per day for AP13, FY2001,” of approximately “21.2” and “average total pieces handled (TPH) per machine per day” of “220, 306 pieces.” Is it appropriate to divide the average TPH by the average hours per day to derive an average number of pieces handled per hour of 10,392? If not, why not?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W., Suite 1000
Washington, DC 20005-3917
202.962.4957
nfwiggins@venable.com
Counsel to the Association for Postal Commerce

November 13, 2001