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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
JOINT INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
USPS WITNESS KINGSLEY
(ABA&NAPM/USPS-T39-1-8)
(November 15, 2001)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association ("ABA") and the National Association of Presort Mailers ("NAPM") hereby submit these joint interrogatories and requests for production of documents.

If the witness to whom an interrogatory or request is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

If data requested is not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format or detail should be provided.

Responses to requests for explanations of the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's response and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how the witness to data from a primary source and developed that data to achieve his final result." Docket No R83-1, Tr. 10/2795-96.

ABA&NAPM/USPS - T-39 - 1

How many AFCs does the USPS currently have in operation?

ABA&NAPM/USPS - T-39 - 2

At several points in your testimony--e.g., page 4, lines 9-13, page 5, lines 8-10, page 9, lines 1-2, page 13, lines 14-26, you testify as to USPS "plans" or "current plans." In several instances it appears that these plans may not be implemented or may only begin to be implemented during or before the Test Year 2003. Please state the purpose for providing information about USPS plans that will not be implemented or will be only partially implemented before the end of the Test Year. What is the probability that the plans will in fact be implemented on the schedule you assume?

ABA&NAPM/USPS - T-39 -3

Please quantify the impact on your testimony, and on the costs developed in this case as the basis for the rates requested by the USPS, of any assumption or assumptions regarding USPS "plans" for the time period beyond TY03 used by you or by any person or persons whose data you relied upon. In your response, please deal specifically with how the current freeze or restrictions on capital expenditures is likely to affect the USPS "plans" you describe.

ABA&NAPM/USPS - T-39 - 4

Identify the time and place of each MLOCR (including "low-cost" MLOCRs), DBCSs, DIOSSs, CSBCSs, MPBCSs, LMLMs which you personally observed being operated and which form the basis, in whole or in part, for your testimony regarding the staffing of such machines; and state the number of persons involved in the operation of the machine at the time of the observation along with a description of the machine being observed that includes the number of pockets into which mail was being sorted, and the number of pockets into which mail could have been sorted at the time of the observation.

ABA&NAPM/USPS - T-39 - 4a

If your testimony regarding the staffing of USPS MLOCRs (including "low-cost" MLOCRs), DBCSs, DIOSSs, CSBCSs, MPBCSs, LMLMs, is based in whole or in part on anything other than personal observations, please identify and described each of the other things on which your testimony regarding the staffing of USPS MLOCRs (including "low-cost" MLOCRs), DBCSs, DIOSSs, CSBCSs, MPBCSs, LMLMs, is based.

ABA&NAPM/USPS - T-39 - 5

Where in the USPS mail processing costs for the TY03 are the labor costs associated with working mail on USPS MLOCRs (including low-cost MLOCRs), DBCSs, DIOSSs, CSBCSs, MPBCSs, and LMLMs, reflected? Please include information indicating the MODS cost pool(s) in which these costs are recorded, and the percentage of costs in such pools attributable to these labor costs.

ABA&NAPM/USPS - T-39 - 6

Please explain how mail is staged for and delivered to USPS MLOCRs (including "low cost" MLOCRs), DBCSs, DIOSSs, CSBCSs, MPBCSs, and LMLMs and how mail that has been processed on these machines is taken away from them to others areas of the facilities. Please include the number of employees engaged in each such activity for each type of machine, and whether they were in addition to those employees staffing the machine itself--i.e., the person feeding the machine and the person sweeping the machine. Please identify the locations facilities at which you personally observed the operation of these machines and the staging and removal of mail that form the basis for your testimony or response to

this interrogatory. Were these staging and removal activities included in the USPS mail processing costs for TY03 and if so in which MODS cost pool ABA&NAPM/USPS - T-39 - 7

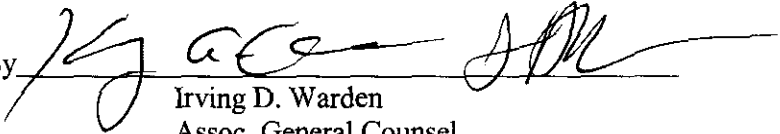
Do any union contracts or work rules have provisions at the local (P&DC and/or District) Area or National level that relate to the number of USPS employees who will staff (i.e., stage [bring mail to], operate [feed and sweep], and remove mail from) USPS MLOCs (including low cost MLOCs) DBCs, DIOSs, CSBCs, MPBCs or LMLMs? If so, provide the specifics concerning the number of employees required by such provisions to staff such equipment.

ABA & NAPM/USPS-T39-8

At page 9, lines 1-15, of your testimony USPS-T-39 you mention that Postal Automated Redirection System (PARS) will be implemented in early CY 2003.

- a. Have the cost saving effects of PARS been included in USPS projections of UAA costs?
- b. What cost savings does USPS expect from implementation of PARS?

Respectfully submitted,
AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

By 

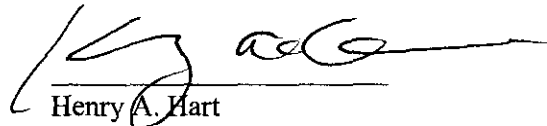
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Date: November 15, 2001
Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

November 15, 2001