

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF MAGAZINE PUBLISHERS OF
AMERICA, INC.
(MPA/USPS-T39-1)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Magazine Publishers of America, Inc.:
MPA/USPS-T39-1, filed on November 1, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 15, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.

MPA/USPS-T-39-1

Please refer to page 15 of your testimony where you state,
“Phase I deployment of 175 machines is complete. Phase II deployment of 362 machines began in December 2000 and is scheduled for completion in April 2002.”

- (a) When was Phase I of the Automated Flat Sorting Machine 100 (AFSM 100) deployment completed?
- (b) Please confirm that the Phase II deployment is still scheduled for completion in April 2002. If not confirmed, please provide the correct completion date.
- (c) Please confirm that, in Phase II, the Postal Service plans to deploy 362 AFSM 100s.
- (d) Is the Postal Service planning a Phase III AFSM 100 deployment?
- (e) If your response to subpart (d) of this interrogatory is yes, when will the deployment begin?
- (f) If your response to subpart (d) of this interrogatory is yes, when will the deployment end?
- (g) If your response to subpart (d) of this interrogatory is yes, how many machines will the Postal Service purchase in Phase III?
- (h) If your response to subpart (d) of this interrogatory is yes, what will the purpose of these machines be?

Response:

- (a) See DMA/USPS-T-39-18a.
- (b) Confirmed.
- (c) Confirmed.
- (d) No.
- (e – h) N/A

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Joseph K. Moore

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