

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 GREETING CARD ASSOCIATION
REDIRECTED FROM WITNESS ROBINSON
(GCA/USPS-T29-25(b))

The United States Postal Service hereby files the response of witness Kingsley to the following interrogatory of Greeting Card Association, filed on November 8, 2001: GCA/USPS-T29-25(b).

The interrogatory has been redirected from witness Robinson to witness Kingsley for response.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE
By its attorneys:

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November 23, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in Docket No. R2001-1.

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TO INTERROGATORIES OF GREETING CARD ASSOCIATION REDIRECTED
FROM WITNESS ROBINSON

GCA/USPS-T-29-25 Please refer to page 21, lines 5 - 7 of your testimony.

- (b) Please identify the operational areas in which the Postal Service could experience operational difficulties upon reversion of a large portion of workshared First-Class Mail.

RESPONSE:

- (b) Operational difficulties would vary locally due to variances in the geographic sources of workshared First-Class Mail and available processing capacity. For example, it would have less of an impact on a facility such as Reno, which does not have a large base of originating workshared First-Class mailers than on a facility that has a greater portion of First-Class Mail that is workshared.

On a system-wide basis, there would be less of an issue today if a portion of the workshared First-Class Mail reverted to single piece than there would have been prior to AFCS/ISS image lift capability. If a significant portion shifts to non-barcoded single piece, then additional OCR/ISS capacity, and to a lesser extent BCS/OSS capacity, would have to be evaluated. With planning, many mail processing facilities handle more than a 50 percent increase in single piece First-Class Mail during the Christmas season with existing equipment and space.