

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

RECEIVED
Nov 26 4 53 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 MILLER
(POSTCOM/USPS-T-24-7-8)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Miller:
PostCom/USPS-T-24-7-8.

Respectfully submitted,

Ian D. Volner fw

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 26, 2001

POSTCOM/USPS-T24-7. Please refer to USPS-LR-J-61, Standard.xls, which develops Standard Mail total mail processing unit cost estimates by rate category for flats.

(a) Please confirm that the AFSM 100/FSM 881 incoming secondary machinable flats coverage factor for Standard mail in cell D19 in worksheet 'COVERAGE FACTORS' is 65%. If you do not confirm, please explain fully.

(b) Please confirm that both the automation and nonautomation mailflow models use the AFSM100/FSM 881 incoming secondary machinable flats coverage factor of 65%. If you do not confirm, please explain fully.

(c) Please confirm that the manual incoming secondary machinable flats coverage factor for Standard mail in cell D21 in worksheet 'COVERAGE FACTORS' is 35%. If you do not confirm, please explain fully.

(d) Please confirm that the automation and nonautomation mailflow models use the manual incoming secondary machinable flats coverage factor of 35%. If you do not confirm, please explain fully.

POSTCOM/USPS-T24-8. Please refer to USPS-LR-J-61, Standard.xls, which develops Standard Mail total mail processing unit cost estimates by rate category for flats.

(a) Please confirm that the following modifications apply the same incoming secondary machinable flats coverage factors for Standard mail as in your unmodified worksheets, allow the application of different incoming secondary machinable flats coverage factors for automation and nonautomation mail, and do not change the mail processing unit cost estimates. If you do not confirm, please explain fully.

'COVERAGE FACTORS' Worksheet

<u>Cells</u>	<u>Formulae</u>
A19	AFSM100/FSM881 – Barcoded
A20	AFSM100/FSM881 – Nonbarcoded
A21	Manual – Barcoded
A22	Manual – Nonbarcoded
D20	65.00%
D22	35.00%

'3-5 NONAUTO MODEL' Worksheet

<u>Cells</u>	<u>Formulae</u>
C83, C84	Replace 'COVERAGE FACTORS'!D19 with 'COVERAGE FACTORS'!D20
H83, H84	Replace 'COVERAGE FACTORS'!D19 with 'COVERAGE FACTORS'!D20

T83, T84 Replace 'COVERAGE FACTORS'!D21 with 'COVERAGE FACTORS'!D22

'BASIC NONAUTO MODEL' Worksheet

<u>Cells</u>	<u>Formulae</u>
C83, C84	Replace 'COVERAGE FACTORS'!D19 with 'COVERAGE FACTORS'!D20
H83, H84	Replace 'COVERAGE FACTORS'!D19 with 'COVERAGE FACTORS'!D20
T83, T84	Replace 'COVERAGE FACTORS'!D21 with 'COVERAGE FACTORS'!D22

(b) Please confirm that the modifications in subpart (a) of this interrogatory and the following incoming secondary machinable flats coverage factors develop presort-adjusted total mail processing unit costs on the 'PRESORT LEVELS HELD CONSTANT' worksheet for 3/5-digit Nonautomation Presort of 13.050 cents and for 3/5-digit Automation Presort Rev of 11.628 cents. If you do not confirm, please explain fully.

'COVERAGE FACTORS' Worksheet

<u>Cells</u>	<u>Formulae</u>
D19	70.00%
D20	60.00%
D21	30.00%
D22	40.00%

(c) Please confirm that the modifications in subpart (a) of this interrogatory and the following incoming secondary machinable flats coverage factors develop presort-adjusted total mail processing unit costs on the 'PRESORT LEVELS HELD CONSTANT' worksheet for 3/5-digit Nonautomation Presort of 13.177 cents and for 3/5-digit Automation Presort Rev of 11.605 cents. If you do not confirm, please explain fully.

'COVERAGE FACTORS' Worksheet

<u>Cells</u>	<u>Formulae</u>
D19	70.00%
D20	50.00%
D21	30.00%
D22	50.00%

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 26, 2001