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

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POSTAL BATE 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-39-20-21)

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-39-20-21.

Respectfully submitted,

Ion Volum 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 20, 2001

POSTCOM/USPS-T39-20. Please refer to your response to POSTCOM/USPS-T39-15(a) where you discuss ID codes for flat mail. Please discuss how you expect the Postal Service will place the ID code on non-prebarcoded flats. In your discussion, please describe the mail processing operations and equipment that will be used as well as personnel and material requirements. If the Postal Service has not determined the preferred method for placing ID codes on non-prebarcoded flats, please describe all alternatives being considered.

POSTCOM/USPS-T39-21. Please refer to your response to POSTCOM/USPS-T39-15(c) where you state, "Current data indicate that the finest depth of sort rate for all machinable flats to vary between 63-75 percent (depending on the operation). We expect that this rate will be lower for nonbarcoded flats."

(a) Please define "finest depth of sort" as used in your response to POSTCOM/USPS-T39-15(c).

(a) Please describe the current data and the source of the data that you refer to in your response to POSTCOM/USPS-T39-15(c).

(b) Did any of the machinable flats referred to in your response to POSTCOM/USPS-T39-15(c) have 11-digit barcodes on them?

(c) What proportion of the machinable flats referred to in your response to POSTCOM/USPS-T39-15(c) were nonbarcoded?

(d) How much lower do you expect the accept rate for nonbarcoded flats to be? Please explain your response fully and provide any underlying data you used to develop your estimate.

(e) What do you expect the accept rate will be for sorting flats with 11-digit barcodes to delivery point sequence? Please explain your answer fully and provide any underlying data you used to develop your estimate.

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.

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