

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 ASSOCIATION FOR POSTAL
COMMERCE
(POSTCOM/USPS-T39-19)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T39-19, filed on November 13, 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 27, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE

POSTCOM/USPS-T39-19 Your answer to DMA/USPS-T-39-3 recites that an “average number of AFSM100 run hours per day for AP13, FY2001,” of approximately “21.2” and “average total pieces handled (TPH) per machine per day” of “220,306 pieces.” Is it appropriate to divide the average TPH by the average hours per day to derive an average number of pieces handled per hour of 10,392? If not, why not?

Response:

No. As stated in response to DMA/USPS-T-39-3, run hours per day is not an accurate measurement of equipment utilization since it includes time when the machine was on but not processing mail such as during crew breaks or sweeping between sort scheme changes.

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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