

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 TAYMAN TO INTERROGATORIES  
OF DOUGLAS F. CARLSON  
(DFC/USPS-T6-1-2)

The United States Postal Service hereby provides the responses of witness Tayman to the following interrogatories of Douglas F. Carlson: DFC/USPS-T6-1-2, filed on November 20, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

\_\_\_\_\_  
Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999; Fax -5402  
December 6, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAYMAN  
TO INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T6-1.** Please refer to interrogatory DMA/USPS-T6-30. Please provide the documents that constitute the “announcement” concerning plant consolidations that was planned for mid-October, with an effective date in January.

**RESPONSE:**

While consolidations under Area Mail Processing remains a priority, these efforts have been overtaken by the events of September 11 and subsequent. Accordingly, it is my understanding that no documents announcing plant consolidation actions have been issued as of this date.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TAYMAN  
TO INTERROGATORIES OF DOUGLAS F. CARLSON

**DFC/USPS-T6-2.** Please refer to your response to DMA/USPS-T6-30(b). Please describe the specific changes that will be made in “AMP of Saturday First-Class originating operations,” including the facilities that will be affected.

**RESPONSE:**

As stated in the response DMA/USPS-T6-30(b) “an aggressive refocus on Area Mail Processing (AMP) is included to maximize success of automation technology.” I am informed that AMP of Saturday FCM is when the small Saturday volume of collection mail from one facility is sent to another, larger, facility to be consolidated with their volumes for processing, thereby eliminating the need for staffing outgoing FCM operations at the smaller facility. At this time, it is not known which facilities will be affected.

## 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.

---

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
December 6, 2001