

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

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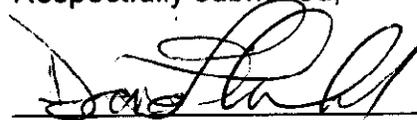
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS KINGSLEY**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Kingsley: DMA/USPS-T39, Nos.36-39. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

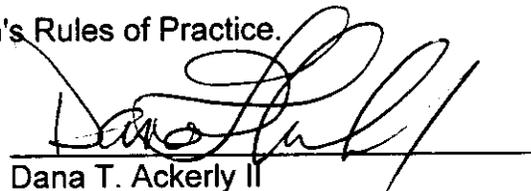


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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Dana T. Ackerly II

Dated: December 10, 2001

**INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC.
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY**

DMA/USPS-T39-36. Please refer to your response to DMA/USPS-T-39-21.

(a) Please confirm that the word "facilities" in your response is synonymous with "plants." If you can not confirm, please define "facilities".

(b) Based on your definition of "facilities," what will the total number of "facilities" be in FY 2003?

(c) Please reconcile your answers to part (a) and (b) of DMA/USPS-T-39-21 by explaining how it can be possible to both (1) have a goal that all facilities have one or more AFSM 100s but no 881s, and (2) have a goal that 75 facilities have no AFSM 100s but one or more FSM 881s.

DMA/USPS-T39-37. On page 13 of your testimony you state, "By FY 2003, the number of FSM 881s in operation is expected to be reduced to approximately 110. They will be primarily relocated to smaller facilities."

(a) In FY 2000, how many facilities had one or more AFSM 100s but no FSM 881s?

(b) In FY 2000, how many facilities had no AFSM 100s but one or more FSM 881s?

(c) In FY 2000, how many facilities had one or more AFSM 100s and one or more FSM 881s?

(d) In FY 2000, how many facilities had neither AFSM 100s nor FSM 881s?

DMA/USPS-T39-38. In speaking of the Multi-Position Flats Sorting Machine 1000 (FSM 1000), you say, "There are 351 machines deployed..."

(a) In the Base Year, how many facilities had one or more AFSM 100s and one or more FSM 1000s?

(b) In the Base Year, how many facilities had one or more FSM 881s and one or more FSM 1000s?

(c) In the Test Year, how many facilities had no AFSM 100s, no FSM 881s, and no FSM 1000s?

DMA/USPS-T39-39. In speaking of the Multi-Position Flats Sorting Machine 1000 (FSM 1000), you say, "There are 351 machines deployed..."

(a) In the Test Year, how many facilities will have one or more AFSM 100s and one or more FSM 1000s?

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(b) In the Test Year, how many facilities will have one or more FSM 881s and one or more FSM 1000s?

(c) In the Test Year, how many facilities will have no AFSM 100s, no FSM 881s, and no FSM 1000s?