

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
DEC 19 11 49 AM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY
(OCA/USPS-T39-23)
December 18, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,


SHELLEY S. DREIFUSS
Acting Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

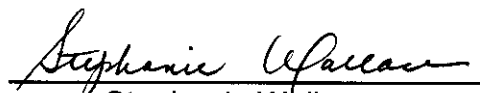
1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T39-23. Please refer to your response to OCA/USPS-T39-13(a), concerning the processing of letter-shaped pieces

- a. Please explain what is meant by the phrase "a change in the pattern," and give examples.
- b. Will stackers fill up faster or slower for automation compatible, barcoded First-Class letter-shaped pieces as compared to automation compatible, barcoded Standard Regular letter-shaped pieces. Please explain.
- c. In the response to OCA/USPS-145(a), it is stated that First-Class sort plans likely involve the use of more stackers. Please confirm that each stacker on average will fill up more slowly for a given volume of letter-shaped pieces. If you do not confirm, please explain.
- d. Please define the term "sweeping," and describe what activities are involved in sweeping.
- e. What is the difference between "sweeping," and the "removal of full trays?"

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 Rule 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
December 18, 2001