

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORY OF
DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T39-21) (ERRATA)

The United States Postal Service hereby provides its revised response of witness Kingsley to the following interrogatory: DMA/USPS-T39-21, filed on October 25, 2001. The original response, filed on November 8, 2001, provided information about the mix of AFSM 100s and FSM 881s flats sorting machines at various postal facilities. This revision is submitted to clarifying responses to subparts (a) and (b); also, to correct the response to subpart (d) from 65 to 75 facilities that have neither flats sorting machine.

The 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

Joseph K. Moore

December 19, 2001

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

DMA/USPS-T-39-21 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) By FY 2003, how many facilities will have one or more AFSM 100s but no FSM 881s?
- (b) By FY 2003, how many facilities will have no AFSM 100s but one or more FSM 881s?
- (c) By FY 2003, how many facilities will have one or more AFSM 100s and one or more FSM 881s?
- (d) By FY 2003, how many facilities will have neither AFSM 100s nor FSM 881s?

RESPONSE:

- a. The goal is for all AFSM 100 facilities to not also have an FSM 881. I am told that it will be approximately 237 facilities.
- b. I am told that it will be approximately 75 facilities.
- c. The goal is to have no facilities with one or more AFSM 100s and one or more FSM 881s.
- d. I am told that there should be no such facilities at the end of FY 2002, but during FY 2003, some of the facilities with FSM 881s only will replace their FSM 881s with FSM 1000s. This will move some or all of the 75 facilities in subpart b of this response to subpart d.

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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December 19, 2001