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

POSTAL RATE AND FEE CHANGES, 2001 Docket No. R

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF LIFETIME ADDRESSING, INC. (LIFETIME/USPS-T39-1-2)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Lifetime Addressing, Inc.: LIFETIME/USPS–T39–1-2, filed on December 10, 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

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3078, Fax –5402 December 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF LIFETIME ADDRESSING, INC.

LIFETIME/USPS-T39-1 Please refer to your testimony, USPS-T39 at page 9, lines 6-7, where you state that the Postal Automated Redirection System (PARS) "will eliminate multiple downstream handlings by moving the processing of UAA letter mail up the automation ladder."

- (a) What is the most recent annual cost to USPS of processing UAA mail?
- (b) How much are the enhancements to the automation equipment projected to cost in order to implement the PARS system?
- (c) Please indicate the annual cost saving the PARS system is projected to achieve in CY 2003 and all years thereafter for which projections have been made.

RESPONSE:

(a) – (c) I have no direct knowledge in which to answer the above questions.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY TO INTERROGATORIES OF LIFETIME ADDRESSING. INC.

LIFETIME/USPS-T39-2 Please refer: (I) to your testimony, T-39 at page 13, lines 14-26 where you describe future systems beyond the test year being pursued by USPS to increase automated volumes, and (2) to the attached article describing 'personalised postcodes' being developed by Royal Mail.

- (a) Has USPS undertaken any project to investigate whether "automated volumes' could be increased and/or UAA mail decreased by replacing the use of physical addresses with a standardized system of unique identifiers for each mail recipient and a database of their current physical addresses? If your answer is 'yes' please identify the project(s) with specificity.
- (b) Has USPS undertaken any project similar to Royal Mail's "personalised postcodes" or any other addressing project to develop a standardized system of unique identifiers for mail recipients? If your answer is 'yes" please identify such project(s) with specificity.
- (c) If your answer is "no" please identify any present USPS project(s), not identified in your testimony or in response to the foregoing interrogatories, to increase "automated volumes" and/or to decrease the volume of UAA mail and the cost of processing it.

RESPONSE:

(a) - (c) Other than almost every delivery point in the United States having its own unique 11-digit delivery point barcode, I have no direct knowledge in which to answer the above questions.

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 o
Practice.

Joseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 21, 2001