

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORY OF OFFICE OF THE  
CONSUMER ADVOCATE  
(OCA/USPS-T39-22)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-T39-22, filed on December 10, 2001.

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

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Joseph K. Moore

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December 26, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T39-22** Please refer to your response to OCA/USPS-T39-9(o). Please respond to part o. based upon a rewriting of the last sentence as follows: "Please quantify the effect on the unit cost when such flat-shaped pieces are processed on the [Flat Sorting Machine] FSM 881 and FSM 1000."

**RESPONSE:**

Without diminishing the importance of the distinction between First-Class Mail and Standard Mail related to processing time, I would expect that the effect on unit cost would be minimal when processed on the FSM 881s or FSM 1000s.

## 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.

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Joseph K. Moore

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December 26, 2001