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BEFORE THE

POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RALPH J. MODEN
(DFC/USPS-T4-12-17)

September 15, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Ralph J. Moden.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: September 15, 1997



DOUGLAS F. CARLSON

DFC/USPS-T4-12. Please provide a list similar to the one that you provided in your response to DFC/USPS-T4-8 that identifies the SLOCR type — Burroughs or Pitney Bowes — that each facility on your list has or had.

DFC/USPS-T4-13.

a. During which years were new Burroughs and Pitney Bowes OCR's originally deployed? How many OCR's of each type were purchased and deployed?

b. Were the Burroughs OCR's generally deployed in the northern half of the country and Pitney Bowes OCR's deployed in the southern half of the country?

DFC/USPS-T4-14. Suppose a letter has a mailer-applied wide-area delivery-point bar code in the address block but no FIM.

a. If this letter is processed on an AFCS that is operating in ISS mode, will the RBCS system (including the RCR) attempt to resolve the address, or will it defer to the mailer-applied bar code?

b. If the RBCS system will defer to the mailer-applied bar code, will the MPBCS-OSS spray a bar code at the bottom of the envelope?

c. If the letter is processed on an MLOCR, will the MLOCR defer to the mailer-applied bar code, or will it attempt to verify the address?

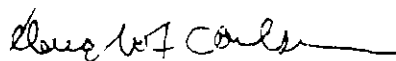
DFC/USPS-T4-15. Please refer to your response to DFC/USPS-T4-8. Why would large ADC's such as Minneapolis, Greensboro, and Denver still have an SLOCR?

DFC/USPS-T4-16. Please provide a list of (1) all facilities that have or will receive RBCS and (2) the location of the REC for each facility that has or will receive RBCS.

DFC/USPS-T4-17. Suppose a typewritten letter is processed on an AFCS that is operating in ISS mode. Will the AFCS lift the image and send it to the RBCS system for resolution, or will it not lift the image and instead send the letter to a stacker for transfer to an MLOCR? If the AFCS can operate in either mode, please explain the circumstances under which the AFCS would be operated in each mode.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

September 15, 1997
Emeryville, California