

DOCKET SECTION

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

RECEIVED

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF
THE AMERICAN BANKERS ASSOCIATION ET AL.
REDIRECTED FROM WITNESS HATFIELD
(ABA&EEI&NAPM/USPS-T25-10, 12 & 28)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the American Bankers Association: ABA&EEI& NAPM/USPS-T25-10, 12 & 28, filed on September 12, 1997, and redirected from witness Hatfield.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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September 25, 1997

**RESPONSE OF POSTAL SERVICE WITNESS MODEN TO
INTERROGATORIES OF ABA, EEI, AND NAPM
REDIRECTED FROM WITNESS HATFIELD**

ABA&EEI&NAPM/USPS-T-25-10. Explain the function of and how each of the following operates:

- (a) MLOCR ISS, and
- (b) MPBCS OSS.

RESPONSE:

(a) The MLOCR-ISS is a modified MLOCR that can "lift" an image of a mailpiece's address. The address information is subsequently processed by the Remote Computer Reader (RCR) and/or a keyer at a Remote Encoding Center (REC) to determine the appropriate ZIP+4/Delivery Point Barcode. A fluorescent ID tag is applied on the back of the mailpiece at the time of the image lift, so the mailpiece can be matched up with the information returned by the RCR or REC site.

(b) The MPBCS-OSS is a modified barcode sorter that can read the ID tag and can spray a barcode on a mailpiece that was initially processed across the MLOCR-ISS. Information that was returned by the RCR or a REC is matched to the fluorescent ID tag on the back of the mailpiece and a barcode is applied to the mailpiece.

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ABA&EEI&NAPM/USPS-T-25-12. You state that "finest depth of sort can mean either a 5-digit, 9-digit, or 11-digit barcode." (Testimony at 12). Please explain the criteria used by the Postal Service to determine which depth of sort is to be employed.

RESPONSE:

See sections A800.2.0 and C840.1.4 of the DMM for the criteria used by the Postal Service to determine which depth of sort is to be employed.

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ABA&EEI&NAPM/USPS-T-25-28. By presort level, see interrogatory 27, above,:

(a) identify the first mail processing operation that First-Class letter mail could be processed together with mail from another class.

(b) identify each mail processing operation in which First-Class letter mail will be processed together with mail from another class. In responding to each subpart, please state all assumptions, if any, and identify by class, subclass, and rate category the mail commingled.

RESPONSE:

(a) Generally, First Class letter mail is segregated from all other classes of letter mail until it reaches the delivery point sequencing operations. Once First Class mail reaches the delivery point sequencing operations, it will be processed together with mail of all other classes in the interest of providing as much delivery point sequenced mail to the carriers as possible. However, your question asks what is the first operation where First Class letter mail "could" be processed together with mail from another class. With that in mind, the first operation "could" be the facer/canceller operation. For instance, single piece Standard (A) dropped in a collection box with First Class mail would be collected by a carrier, dispatched to the plant, and processed through the facer/canceller operation.

(b) See response to 28 (a). Any other instances of First Class letter mail being processed with letter volumes of other classes are incidental. For instance, it is possible that machine rejects from an earlier tour could inadvertently be intermingled with other mail on a later tour.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/25/97

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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