

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

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

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of Douglas F. Carlson: DFC/USPS-T4-12-17, filed on September 15, 1997.

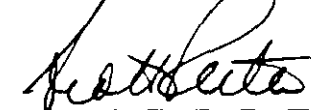
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF 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.

Response:

See attached list.

SLOC R Sites

MOJAVE CA	<i>Burroughs</i>
EUREKA CA	<i>Burroughs</i>
REDDING CA	<i>Burroughs</i>
BATON ROUGE LA	<i>Bell & Howell</i>
OKLAHOMA CITY OK	<i>Bell & Howell</i>
TULSA OK	<i>Bell & Howell</i>
AMARILLO TX	<i>Bell & Howell</i>
ALBANY GA	<i>Burroughs</i>
COLUMBUS GA	<i>Burroughs</i>
JOHNSON CITY TN	<i>Burroughs</i>
JACKSON TN	<i>Burroughs</i>
MID MISSOURI MO	<i>Burroughs</i>
BALTIMORE MD	<i>Burroughs</i>
CUMBERLAND MD	<i>Burroughs</i>
NJI BMC	<i>Burroughs</i>
KENNEDY AMC	<i>Burroughs</i>
CENTRAL MA	<i>Burroughs</i>
BOSTON	<i>Burroughs</i>
BROCKTON MA	<i>Burroughs</i>
CAPE COD MA	<i>Burroughs</i>
EASTERN MAINE	<i>Burroughs</i>
BURLINGTON VT	<i>Burroughs</i>
PLATTSBURGH NY	<i>Burroughs</i>
WATERTOWN NY	<i>Burroughs</i>
GREENSBURG PA	<i>Burroughs</i>
DUBOIS PA	<i>Burroughs</i>
ERIE PA	<i>Burroughs</i>
ALTOONA PA	<i>Burroughs</i>
WILLIAMSPORT PA	<i>Burroughs</i>
SCRANTON PA	<i>Burroughs</i>
WHEELING WV	<i>Burroughs</i>
ZANESVILLE OH	<i>Burroughs</i>
STEUBENVILLE OH	<i>Burroughs</i>
MANSFIELD OH	<i>Burroughs</i>
BRISTOL VA	<i>Burroughs</i>
BECKLEY WV	<i>Burroughs</i>
GREENSBORO NC	<i>Burroughs</i>
COLUMBIA SC	<i>Burroughs</i>
GREAT FALLS MT	<i>Burroughs</i>
BUTTE MT	<i>Burroughs</i>
MISSOULA MT	<i>Burroughs</i>
DENVER CO	<i>Burroughs</i>
GRAND JUNCTION CO	<i>Burroughs</i>
CASPER WY	<i>Burroughs</i>
ROCK SPRINGS WY	<i>Burroughs</i>
POCATELLO ID	<i>Burroughs</i>
SALT LAKE CITY UT	<i>Burroughs</i>
PROVO UT	<i>Burroughs</i>
PHOENIX AZ	<i>Burroughs</i>
PORTLAND OR	<i>Burroughs</i>
MEDFORD OR	<i>Burroughs</i>
BEND OR	<i>Burroughs</i>
EVERETT WA	<i>Burroughs</i>
WENATCHEE WA	<i>Burroughs</i>
YAKIMA WA	<i>Burroughs</i>

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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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?

Response:

a. The Burroughs and Pitney Bowes SLOCRs were deployed between 1982 and 1985.

There were 126 machines of each type for a total of 252 machines.

b. I am told that the information is no longer available.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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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?

Response:

a. It is assumed that mail with a mailer applied bar code will be typed. If the AFCS/ISS is operating in the "lift script" mode, the bar code will be ignored and the mailpiece will be routed to the stacker for the OCR. The OCR will attempt to read and sort on the mailer applied bar code. If the AFCS/ISS is operating in the "lift everything" mode, the image will be sent to the RBCS system. The RCR has no capability to resolve bar codes, so it will attempt to resolve the address.

b. Not applicable.

c. The MLOCR defers to the mailer applied bar code.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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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?

Response:

The equipment list that was provided as an attachment to DFC/USPS-T4-8 was based on information contained in AUTO. As mentioned in the response to OCA/USPS-T4-20(b), the information in AUTO is not up-to-date. Therefore, it is possible that the equipment is no longer located at those facilities.

Attachment to DFC/USPS-T4-16 (Page 2 of 6)
 Cross Reference - Processing and Distribution Center to
 Remote Encoding Center

P&DC Supported	REC Name
Columbus, OH	Dayton, OH
Corpus Christi, TX	McAllen, TX
Dallas, TX	Little Rock, AR
Dayton, OH	Dayton, OH
Daytona Beach, FL	Bowling Green, KY
Denver, CO	Glendale, AZ
Des Moines, IA	Wichita, KS
Detroit, MI	Gary, IN
Dulles, VA	Charleston, WV
Duluth, MN	Davenport, IA
Eau Claire, WI	Duluth, MN
El Paso, TX	Beaumont, TX
Elmira, NY	Syracuse, NY
Erie, PA	Pittsburg, PA
Eugene, OR	Portland, OR
Evansville, IN	Louisville, KY
Everett, WA	Portland, OR
Fargo, ND	Wichita, KS
Fayetteville, AR	Sherwood, AR
Fayetteville, NC	Fayetteville, NC
Flint, MI	Kalamazoo, MI
Florence, SC	Charleston, SC
Flushing (Queens), NY	Lumberton, NC
Fort Myers, FL	Chattanooga, TN
Fort Wayne, IN	Fort Wayne, IN
Fort Worth, TX	Abilene, TX
Fox Valley, IL	Gary, IN
Frederick, MD	Greensboro, NC
Fresno, CA	Selma, CA
Ft Lauderdale, FL	Antioch, TN
Gainesville, FL	Jacksonville, FL
Gary, IN	Peoria, IL
Grand Island, NE	Wichita, KS
Grand Rapids, MI	Gary, IN
Green Bay, WI	Des Moines, IA
Greensboro, NC	Salem, VA
Greenville, SC	Charleston, SC
Gulfport, MS	Jacksonville, FL
Hackensack, NJ	Western Nassau, NY
Harrisburg, PA	Dayton, OH
Hartford, CT	Syracuse, NY
Hickory, NC	Salem, VA
Honolulu, HI	Chula Vista, CA
Houston, TX	Beaumont, TX
Huntington, WV	Falling Waters, WV
Huntsville, AL	Birmingham, AL

Attachment to DFC/USPS-T4-16 (Page 3 of 6)
 Cross Reference - Processing and Distribution Center to
 Remote Encoding Center

P&DC Supported	REC Name
Indianapolis, IN	Madisonville, KY
Industry (Alhambra), CA	Riverside, CA
Jackson, MS	Jacksonville, FL
Jacksonville, FL	Chattanooga, TN
JFK Air Mail Center, NY	Western Nassau, NY
Kalamazoo, MI	Fort Wayne, IN
Kansas City, KS	Wichita, KS
Kansas City, MO	Wichita, KS
Kilmer (New Brunswick), NJ	Princeton, NJ
Knoxville, TN	Bowling Green, KY
Kokomo, IN	Kalamazoo, MI
Lafayette, IN	Fort Wayne, IN
Lafayette, LA	Baton Rouge, LA
Lakeland, FL	Tampa, FL
Lancaster, PA	York, PA
Lansing, MI	Fort Wayne, IN
Las Vegas, NV	Glendale, AZ
Lehigh Valley, PA	Lehigh Valley, PA
Lexington, KY	Louisville, KY
Lima, OH	Dayton, OH
Lincoln, NE	Des Moines, IA
Little Rock, AR	Little Rock, AR
Long Beach, CA	San Bernadino, CA
Los Angeles, CA	Riverside, CA
Louisville, KY	Louisville, KY
Lubbock, TX	Abilene, TX
Lynchburg, VA	Falling Waters, WV
M.L. Sellers(San Diego), CA	Chula Vista, CA
Macon, GA	Bowling Green, KY
Madison, WI	Duluth, MN
Manasota, FL	Birmingham, AL
Manchester, NH	Nashua, NH
Manhattan, NY #1	Fishkill, NY
Manhattan, NY #2	Fishkill, NY
Mankato, MN	Duluth, MN
Marina (Inglewood), CA	McAllen, TX
Marysville, CA	Modesto, CA
McAllen, TX	Beaumont, TX
Memphis, TN	Tampa, FL
Miami, FL	Birmingham, AL
Mid Florida, FL	Jacksonville, FL
Mid Island, NY	Princeton, NJ
Mid-Hudson, NY	Western Nassau, NY
Middlesex-Essex, MA	Lynchburg, VA
Midland, TX	McAllen, TX
Milwaukee, WI	Des Moines, IA

Attachment to DFC/USPS-T4-16 (Page 4 of 6)
 Cross Reference - Processing and Distribution Center to
 Remote Encoding Center

P&DC Supported	REC Name
Minneapolis, MN	Davenport, IA
Mobile, AL	Jacksonville, FL
Monmouth, NJ	Western Nassau, NY
Montgomery, AL	Bowling Green, KY
Muncie, IN	Fort Wayne, IN
Nashville, TN	Antioch, TN
New Castle, PA	Pittsburg, PA
New Haven, CT	Albany, NY
New Orleans, LA	Baton Rouge, LA
Newark, NJ	Kearny, NJ
No Jersey (DVD), NJ	Kearny, NJ
Norfolk, NE	Wichita, KS
Norfolk, VA	Newport News, VA
North Bay, CA	Selma, CA
North Houston, TX	Beaumont, TX
North Metro, GA	Antioch, TN
North Texas, TX	Little Rock, AR
Northern Va, VA	Charleston, WV
Northwest (Waltham)	Albany, NY
Oakland, CA	Hayward, CA
Oklahoma City, OK	Tulsa, OK
Olympia, WA	Portland, OR
Omaha, NE	Des Moines, IA
Orlando, FL	Tampa, FL
Oshkosh, WI	Wichita, KS
Oxnard, CA	Chula Vista, CA
Palatine, IL	Peoria, IL
Pasadena, CA	McAllen, TX
Pasco, WA	Twin Falls, ID
Paterson, NJ (NJ Metro)	Fishkill, NY
Pensacola, FL	Jacksonville, FL
Peoria, IL	Kalamazoo, MI
Philadelphia, PA	Lehigh Valley, PA
Phoenix, AZ	Glendale, AZ
Pittsburg, PA	Pittsburgh, PA
Portland, ME	Syracuse, NY
Portland, OR	Salt Lake City, UT
Portsmouth, NH	Lynchburg, VA
Providence, RI	Lynchburg, VA
Raleigh, NC	Salem, VA
Reading, PA	York, PA
Reno, NV	Portland, OR
Richmond, VA	Newport News, VA
Roanoke, VA	Falling Waters, WV
Rochester, MN	Davenport, IA
Rochester, NY	Syracuse, NY

Attachment to DFC/USPS-T4-16 (Page 5 of 6)
 Cross Reference - Processing and Distribution Center to
 Remote Encoding Center

P&DC Supported	REC Name
Rock Island, IL	Davenport, IA
Rockford, IL	Fort Wayne, IN
Rocky Mount, NC	Salem, VA
Royal Oak, MI	Peoria, IL
Sacramento, CA	Modesto, CA
Saginaw, MI	Knoxville, TN
Saint Cloud, MN	Davenport, IA
Saint Louis, MO	Duluth, MN
Saint Paul, MN	Duluth, MN
Saint Petersburg, FL	Bowling Green, KY
Salem, OR	Portland, OR
Salinas, CA	Modesto, CA
Salt Lake City, UT	Salt Lake City, UT
San Antonio, TX	Laredo, TX
San Bernadino, CA	Riverside, CA
San Francisco, CA	Selma, CA
San Jose, CA	Modesto, CA
Santa Ana (No. Cnty), CA	San Bernadino, CA
Santa Barbara, CA	Chula Vista, CA
Santa Clarita, CA	McAllen, TX
Savannah, GA	Birmingham, AL
Scranton, PA	Pittsburgh, PA
Seattle, WA	Salt Lake City, UT
Shreveport, LA	Baton Rouge, LA
Sioux City, IA	Davenport, IA
Sioux Falls, SD	Wichita, KS
South Bend, IN	Kalamazoo, MI
South Florida, FL	Chattanooga, TN
South Jersey, NJ	York, PA
South Suburban, IL	Peoria, IL
Southeastern, PA	York, PA
Southern MD, Md	Charleston, WV
Spokane, WA	Twin Falls, ID
Springfield, IL	Kalamazoo, MI
Springfield, MA	Nashua, NH
Springfield, MO	Davenport, IA
Stamford, CT	Albany, NY
Stockton, CA	Modesto, CA
Suburban MD, MD	Charleston, WV
Syracuse, Ny	Syracuse, NY
Tacoma, WA	Portland, OR
Tallahassee, FL	Jacksonville, FL
Tampa, Fl	Tampa, FL
Toledo, OH	Akron, OH
Topeka, KS	Wichita, KS
Traverse City, MI	Kalamazoo, MI

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF DOUGLAS F. CARLSON

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.

Response:

The subsequent processing of a letter after it goes through the AFCS/ISS is dependent on whether the AFCS/ISS is operating in "lift script only" or "lift everything" mode. The advantage of operating in the "lift everything" mode is you save a mail handling on type written mail that the MLOCR can't resolve. The problem with using the "lift everything" mode is one of capacity. It puts a lot more images through the RBCS network (i.e. the LAN that connects the image lift to the rest of the system), increases the images processing capability requirements for the RCR, and adds mail to the OSS. Therefore, facilities generally use the "lift script only" mode.

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: 9/29/97

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 29, 1997