

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

**Postal Rate and Fee
Changes, 2005**

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Docket No. R2005-1

**Interrogatories of National Newspaper Association (NNA)
to United States Postal Service Witness Marc D. McCrery,
NNA/USPS T29-1-5
(June 10, 2005)**

Pursuant to sections 25 and 26 of the Rules of Practice, National Newspaper Association hereby directs interrogatories to United States Postal Service Witness Marc McCrery. If any interrogatory cannot be answered by the witness, NNA requests that it be directed to a witness who can provide a response.

Respectfully submitted,

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June 10, 2005

NNA/USPS T29-1

How many mail processing facilities have UFSM 1000 machines at present? If possible, please break down your response into facility types, such as BMCs and P&DCs.

NNA/USPS T29-2

Does the Postal Service intend to shut down or redeploy any UFSM 1000 machines prior to the end of the test year? If so, please explain the plans for these machines and give the reasons for any changes in operational plans.

NNA/USPS T29-3

What percentage of flat mail cannot be processed on an AFSM 100 machine but can be processed on a UFSM 1000 machine? If you do not have a precise response, please provide your best estimate.

NNA/USPS T29-4

Under what circumstances might a plant manager with an available UFSM 1000 machine choose to process flat mail manually rather than on that machine, assuming it is mail that is not susceptible to processing on an AFSM 100?

NNA/USPS T29-5

With regard to decisions to process non-automated flat mail manually rather than on an available UFSM 1000 machine, please respond to the following:

- a. Is the decision left to the sole discretion of the plant manager?
- b. Are there any operational guidelines or manuals provided by the Postal Service to plant personnel to guide or govern a decision to use manual labor rather than the UFSM 1000? If so, please provide copies.

- c. Is there an optimal volume for flats that would justify use of the UFSM 1000 rather than manual labor, and if so, what is that volume?
- d. Is it ever less costly to use manual labor for this processing than the UFSM 1000, and if so, why?
- e. If the Postal Service had perfect flexibility in workforce management, such as being able to send workers home when work is completed rather than at the end of a shift, would decisions about using a UFSM 1000 rather than manual labor be different for plant managers, in your opinion?