

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

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POSTAL RATE AND FEE CHANGES, 1997

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS BRADLEY
(NAA/USPS-T14-20)

The United States Postal Service hereby provides the response to the following interrogatory of the Newspaper Association of America: NAA/USPS-T14-20, filed on September 17, 1997, and redirected from witness Bradley.

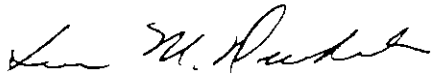
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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October 1, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF THE NAA
REDIRECTED FROM WITNESS BRADLEY**

NAA/USPS-T14-20. Please refer to your response to Interrogatory NAA/USPS-T-14-12. Assume that a hypothetical facility currently uses one BCS machine and plans to install a second machine because of projected increases in bar-coded mail volume.

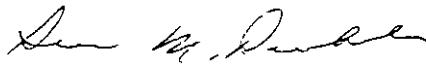
- a. Is it reasonable to expect that the total amount of time spent by facility workers on BCS set-up and any related activities will double after installation of the second machine? If no, please explain why not.
- b. Assume that the hypothetical facility later decides to remove the second BCS machine because of projected future decreases in bar-coded mail volume. Is it reasonable to expect that the total amount of time spent by facility workers on BCS set-up and any related activities will be half that required with two BCS machines? If no, please explain why not.
- c. Please explain how set-up time and related activities vary as a function of the number of machines at a facility.

Response:

- a. No. The time spent placing support equipment around the BCSs will less than double. In addition, the time spent taking mail to and from the machines will less than double.
- b. No, see part a.
- c. See part a.

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.



Susan M. Duchek

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October 1, 1997