

ADVO, INC. INTERROGATORIES TO USPS WITNESS COOMBS (USPS-T-44)

ADVO/USPS-T44-1. With respect to the plans for FSS and its potential for route restructuring, has the USPS considered any new flat containers or any new carrier containers or vehicles? Please explain.

ADVO/USPS-T44-2. On page 8, you state that: “The FSS mail bundles will be picked up in the FSS staging area and taken directly to the street just as DPS letters are currently handled.”

(a) With respect to FSS mail bundles, will the FSS or allied labor actually bundle and somehow tie out FSS processed mail? Please explain.

(b) Will the staging area at the DDU generally be on the dock or just inside the dock door. Or will there be some other area generally designated to be the staging area? Please explain.

ADVO/USPS-T44-3. Please identify the types of containers the carriers generally use to move mail from their cases to their vehicles and explain why they are used. If this varies by shape or type of mail, please explain. If carriers use containers within containers (e.g., trays within hampers), please also explain those arrangements.

ADVO/USPS-T44-4. On page 6, you describe the FSS pilot program and plans for a multi-year deployment.

(a) Has a budget been approved for any pre-production FSS machines (to be deployed in 2007). Please explain.

(b) Has a budget been approved for any full-production FSS machines? Please explain.

(c) How many years does the multi-year deployment represent? Please explain.

ADVO/USPS-T44-5. With respect to the FSS space requirements:

(a) Please identify the space requirements for one FSS machine.

(b) Generally, for high-value (plant) candidates receiving the first machines, please quantify the number of FSS machines they would require.

(c) Do processing plants currently have sufficient space for FSS capacity to cover their delivery areas? If not, please explain the USPS plan to acquire sufficient FSS space.

(d) Will FSS ever be deployed at delivery units? Please explain.

ADVO/USPS-T44-6. On page 8, you state:

“It is currently projected that the majority of all Standard Mail flat-shaped pieces will be processed using FSS once it is implemented, with the possible exception of saturation flats. Periodicals and First Class Mail flat-shaped pieces will also be processed utilizing FSS, but they will be impacted to a lesser degree because of service standards, particularly for First-Class Mail.”

Please explain this statement – i.e., to what degree do you believe that Standard Mail flat-shaped pieces will be impacted by FSS?

ADVO/USPS-T44-7. Once FSS is implemented,

(a) At what processing point will Standard mail flats be combined with First Class/Periodical/ Package Services flats? Please explain fully.

(b) At what point will the processing of Standard mail flats at the plant be halted in the event that some of those flats need to be deferred as a result of a carrier supervisor decision? Please explain fully.

ADVO/USPS-T44-8. On pages 8 and 9, you explain that FSS will save considerable amount of in-office time but may impact street time. If the USPS has quantified the extent of the impact on in-office and/or street time, please provide that information. If it has not quantified the extent of that impact, please explain why.