

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
AND THE MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS MARC D. McCRERY**

(POSTCOM/USPS-T42-1 - 9)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing and Fulfillment Service Association (herein, collectively "PostCom") directs the attached First Set of Interrogatories to Witness Marc D. McCrery. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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July 14, 2006

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POSTCOM/USPS-T42-1. Please confirm that the Postal Service does not propose any changes in the definition of letters eligible for Standard Mail automation letter rates, as set forth in Section 201.3.0 of the Domestic Mail Manual (“DMM”). If you are unable to confirm, please set forth in detail the reasons for your answer.

POSTCOM/USPS-T42-2. Please list the equipment that the Postal Service uses to process Standard Mail automation letters.

POSTCOM/USPS-T42-3. Please provide copies of any tests or studies the Postal Service has performed since June, 2002 to measure the effects, if any, of the weight of automation compatible letters on the operation and performance of the Postal Service’s letter automation equipment, including the equipment listed in response to POSTCOM/USPS-T42-3.

POSTCOM/USPS-T42-4. In your testimony (at p. 6 *et seq.*) you describe various upgrades and retrofitting of DBCS and related equipment intended to allow the machines to process letters with a wider range of mail characteristics.

a. Please identify the full range of mail characteristics that can be processed on the following equipment, including but not limited to the range in weight of letters.

- i. DBCS
- ii. DBCS-EC
- iii. DIOSS
- iv. DIOSS-EC

b. Please identify the full range of mail characteristics (including but not limited to the full range in weight of letters) that can be processed on the equipment listed in response to POSTCOM/USPS-T42-3.

c. Please provide copies of any and all studies, tests, documents and information in the Postal Service's possession that support your response to parts "a" and "b" of this question.

POSTCOM/USPS-T42-5. At p. 15 of your testimony, you indicate that incremental software releases, new secondary address readers, and new cameras are expected to be deployed to enhance the UFSM1000s over the next several years.

a. Please confirm that the Postal Service does not plan to take the UFSM1000s out of service before or during the test year. If you cannot confirm, please explain.

b. Will mailpieces meeting the current definition of UFSM1000 flats will continue to be processed on the UFSM1000 during the test year?

POSTCOM/USPS-T42-6. Please refer to your response to P.O.I.R. No. 5, question 1(e) – (l) where you state that the flows for the specified types of hybrid flats and hybrid parcels “cannot be mapped out until the preparation is finalized.”

a. Please explain in detail the assumptions that you made concerning the flows of these types of mail in the development of your testimony.

b. Please confirm that until the flows have been finalized, it is not possible to determine what percentage of hybrid parcels and hybrid flats will be processed manually, what percentage will be processed on Postal Service sorting equipment, and what

category of mail sorting equipment will be used for these purposes. If you do not confirm, please explain your answer in detail.

POSTCOM/USPS-T42-7. Please confirm that all flat-shaped mailpieces that are currently prepared as eligible for automation rates would also be eligible for automation rates in TY2008. If you cannot confirm, please explain in detail.

POSTCOM/USPS-T42-8. Please indicate whether the Postal Service expects to impose flats address placement requirements in the next eighteen months that will restrict eligibility of flats that do not meet these address placement requirements for automation flats rates. If so,

a. Please describe the operational circumstances that precipitate any anticipated address placement requirements (e.g., please describe any limitations of FSS equipment, or labor-related efficiencies gained)

b. When are proposed requirements expected to be published?

c. When are final requirements expected to be implemented?

POSTCOM/USPS-T42-9. Please refer to USPS-LR-L-33 at pp. 28-29.

a. Please describe the design or operational limitations of the AFSM100, if any, that precipitate the Turning Ability Requirement.

b. Please describe the design or operational limitations of the AFSM100, if any, that precipitate the Minimum Rigidity Requirement.

c. Please describe the design or operational limitations of the AFSM100, if any, that precipitate the Maximum Rigidity Requirement.

d. Please describe the design or operational limitations of any other equipment that may be fully implemented during the Test Year that precipitate any of the requirements identified in parts a-c.