

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS McCRERY  
TO INTERROGATORIES OF ADVO, INC.  
REDIRECTED FROM WITNESS COOMBS  
(ADVO/USPS-T44-4-5)  
(July 26, 2006)

The United States Postal Service hereby provides the responses of witness McCrery to the above-listed interrogatories of ADVO, Inc., filed on July 12, 2006. These interrogatories were redirected from witness Coombs.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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TO INTERROGATORY OF ADVO INC.  
REDIRECTED FROM WITNESS COOMBS

**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.

**Response:**

- a) Funding has been approved for the deployment of a pre-production machine in 2007.
- b) No, a funding request for the program has yet to be submitted for approval.
- c) The timeframe cannot be determined at this time.

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**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.

**Response:**

- (a) The current planning space is 15,000 square feet per machine, though this may change if and when production machines are deployed.
- (b) The number of machines deployed to a site is based on cased volumes. It is estimated that each machine could process approximately 280,000 pieces per day. Though plans have yet to be finalized, it appears that high-value plants could receive anywhere from 2 to 6 machines.
- (c) The space is under review. We are currently evaluating space availability.
- (d) It is unlikely.