

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND
SEATTLE FILMWORKS, INC.
REDIRECTED FROM WITNESS SECKAR
(NDMS/USPS-T26-1-10)

The United States Postal Service hereby provides responses to the following interrogatories of Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc.: NDMS/USPS-T26-1-10, filed on November 6, 1997, and redirected from witness Seckar.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 13, 1997

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NDMS/USPS-T26-1.

a. Please confirm that the FSM used for the field test at the Albany, NY P&DC and described in LR-H-169 was a pre-production model of machines subsequently purchased by the Postal Service and was specifically obtained (*rented?*) for the purpose of the test. If you do not confirm, please explain the status of the machine described in LR-H-169.

b. Are production models of the FSM 1000 that have subsequently been purchased and installed at Postal Service facilities identical to the model used in the test described in LR-H-169? If not, please describe all differences, including but not limited to those that alter the speed of operation, average productivity (throughput), staffing level, and range of pieces machinable.

RESPONSE:

a. Confirmed.

b. No. The production models have been engineered to facilitate efficient and safe manufacturing. The production models have four induction stations, and require a total of six staff to work the machine. The prototype studied in Albany had two induction stations, and required a total of four staff to work the machine. The specifications for the production machine are: 0.007 minimum and 0.875 maximum thickness in inches, 0.32 minimum and 96 maximum weight in ounces, 3.94 minimum and 12 maximum height in inches, and 3.94 minimum and 15.75 maximum width in inches. Please refer to Attachment NDMS/USPS-T26-1(b) for information specific to the production model. Note, however that the productivity of 767.58 that results from the test is hypothetical as a result of the test methodology. Specifically, the test was performed under 'stopwatch' production procedures that do not include the downtime that

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would normally occur during a shift. Hence, the productivity of 650 pieces per hour as detailed in LR-H-169 is still viewed as the most reasonable figure for the FSM-1000.

FSM 1000 FIRST ARTICLE EVALUATION TOUR 2 ONLY, NO TEST DATA (MER, FAN, ETC.)

a	b	c	d	e	f	g	h	j			l			n			p			q			s	t	u	v	w	x
Date	Run no.	Rcdr.	Mods op#	Oper	swp/load	Scheme	EOR Counter	hr	min	sec	Decimal Hrs.	hr	min	sec	Decimal Hrs.	min	sec	Decimal Hrs.	min	sec	Decimal Hrs.	Adjust	Tot Hrs.	Man Hrs.	Pcs/Oper Hr	1 Jam per X Pcs		
7/22/96	2	RS	444	4	2	N44	25193	6	44	0	6.73	1	15	52	1.26	14	37	0.24	0.38	6.09	36.56	689.09	681					
7/23/96	2	JM	441	4	2	N44	31091	7	2	0	7.03	1	16	30	1.28	14	37	0.24	0.40	6.40	38.41	809.40	723					
7/24/96	2	RS	444	4	2	N44	27232	6	38	0	6.60	1	15	44	1.26	14	37	0.24	0.37	5.95	35.72	762.36	908					
7/25/96	2	RS	444	4	2	N44	28213	7	0	0	7.00	1	18	38	1.28	14	37	0.24	0.40	6.36	38.18	738.86	723					
7/26/96	3	RS	444	4	2	N44	21077	5	39	0	5.65	1	14	30	1.24	14	48	0.25	0.31	4.97	29.79	707.48	958					
7/29/96	2	RS	444	4	2	N44	28158	6	43	0	6.72	1	15	11	1.25	16	25	0.27	0.38	6.12	36.72	766.87	1,482					
7/30/96	2	RS	444	4	2	N44	30671	8	40	0	6.67	1	17	49	1.30	9	57	0.17	0.37	5.90	35.43	865.74	2,191					
7/31/96	2	RS	444	4	2	N44	28633	8	46	0	6.77	1	17	31	1.29	14	37	0.24	0.38	6.10	36.80	782.38	1,909					
8/1/96	3	RS	444	4	2	N44	18116	5	33	0	5.55	1	15	9	1.25	14	12	0.24	0.30	4.84	29.02	624.29	1,647					
8/2/96	2	RS	444	4	2	N44	35441	6	51	0	6.85	1	15	52	1.26	12	39	0.21	0.39	6.18	37.10	955.37	2,953					
8/5/96	2	RS	444	4	2	N44	22397	6	46	0	6.77	1	46	16	1.77	10	47	0.18	0.34	5.52	33.12	676.21	933					
8/6/96	2	RS	444	4	2	N44	29890	6	45	0	6.75	1	19	19	1.32	15	12	0.25	0.38	6.06	36.36	822.04	1,868					
8/7/96	2	RS	444	4	2	N44	30617	6	44	0	6.73	1	17	0	1.28	13	45	0.23	0.38	6.08	36.35	842.37	2,041					
8/8/96	3	RS	444	4	2	N44	16150	5	30	0	5.50	1	15	51	1.26	11	27	0.19	0.30	4.72	28.33	570.06	1,468					
8/9/96	2	RS	444	4	2	N44	24778	5	45	0	5.75	1	9	44	1.16	10	21	0.17	0.32	5.08	30.47	813.31	1,239					
TOTALS				4	2		397657				97.07					19.48	14	37	3.36		86.34	518.07	767.58	1,212				

a: Calendar date of the test run
b: The number of the run on that tour
c: The initials of the individual recording the data
d: The Mods operation number for the run
e: The number of keyers inputting mail
f: The number of persons performing sweeping & loading
g: The sort scheme used
h: End of Run (EOR) report counter total for pieces fed
j: Total clock time recorded for the operation

l: Decimal hours of "j" above
n: Total of recorded "U" - USPS Stop elements; typically 2 breaks and 1 lunch
p: Decimal hours of "n" above
q: Total clock time recorded for full machine sweep down
s: Decimal hours of "q" above
t: Standard break time allotment @ the rate of 30min/7.5 hrs.: $(l-p+s) * 0.06866$
u: Total adjusted run hours: $l-p+s+t$
v: Total adjusted run hours x total persons: $(e+f)*u$
w: Counter total divided by the total man hours: h/v
x: 1 Jam in "X" number of pieces (goal = 1 Jam in 650 pcs)

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NDMS/USPS-T26-2.

a. Has the Postal Service run any tests on production models of the FSM 1000 that are similar to the tests reported in LR-H-169? That is, are any more recent data available for the FSM 1000s currently installed at Postal Service facilities?

b. Are the data reported in LR-H-169 still considered the best data available for the FSM 1000? Unless your answer is an unqualified affirmative, please provide a copy of more recent data which update and/or supercede those in LR-H-169.

RESPONSE:

a. Yes.

b. Please see Attachment NDMS/USPS-T26-1(b).

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NDMS/USPS-T26-3. According to the machinable flat mail standards shown in LR-H-169, the FSM-1000 can handle pieces with a minimum and maximum thickness of 0.008 and 1.25, respectively. Please confirm that the minimum and maximum thickness stated there are in inches. If you do not confirm, please provide the appropriate reference (*e.g.*, centimeters).

RESPONSE:

The minimum and maximum thickness as stated in the LR-H-169 are 0.008 and 1.25 *inches* respectively.

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NDMS/USPS-T26-4.

a. According to the machinable flat mail standards shown in LR-H-169, the FSM-1000 can handle pieces with a minimum and maximum weight of 0.07 and 105.0 ounces, respectively. Do the standards of the FSM enable routine processing of flats that weigh less than one-tenth of one ounce? Is this a correct interpretation of the minimum weight of 0.07? Please explain any answer that is not an unqualified affirmative.

b. Do the standards of the FSM enable routine processing of flats that weigh less than one ounce (*i.e.*, flimsies)? Please explain any answer that is not an unqualified affirmative.

c. Were flimsies included in any of the test runs described in LR-H-169? If so, did they present any problems, such as induction jams, transport jams, damaged pieces, flyouts, missorts, etc.?

d. Has the Postal Service run any test designed to ascertain the machinability of flimsies on the FSM-1000? If so, please provide the results of such tests.

e. Aside from tests specifically designed for sorting flimsies, has the Postal Service collected and recorded any data which reflect experience with sorting flimsies on the FSM-1000? If so, please provide.

RESPONSE:

- a. The pre-production FSM-1000 that was tested in Albany processed nonmachinable flats that had a minimum weight of 0.07 ounces.
- b. The standards of the pre-production FSM-1000 that was tested processed nonmachinable flats that had a minimum weight of 0.07 ounces. Please refer to NDMS/USPS-T26-1(b) for the production FSM-1000 specifications.
- c. Yes. Induction jams, transport jams, damaged pieces, flyouts, missorts, etc., occurred as indicated in LR-H-169.
- d. No.
- e. No.

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NDMS/USPS-T26-5.

- a. Please refer to LR-H-169 and confirm that for Category 1 mail the jam rate per 1000 pieces fed to the FSM 1000 was 0.52, 0.17, and 0.43 for, respectively, operations 141, 143, and 146.
- b. Are these still the best data available on the jam rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.
- c. What are the comparable jam rates on FSM 881s?

RESPONSE:

- a. Confirmed.
- b. Yes. Although the results of a more recent test for a production FSM-1000 have been made available, the test was not structured in the same manner as the Albany test with respect to segmenting the mailstream into Categories 1, 2, and 3 mail. Therefore, the Albany test provides the best data available on the jam rate of Category 1 mail on the FSM-1000.
- c. The jam rate per 1,000 pieces fed into the FSM 881 is 1.8.

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ABP/USPS-T26-6.

- a. Please refer to LR-H-169 and confirm that the missort rate for Category 1 mail fed on the FSM 1000 was 0.9 percent, 0.8 percent, and 2.8 percent for, respectively, operations 141, 143, and 146.
- b. Are these still the best data available on the missort rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.
- c. What are the comparable missort rates on FSM 881s?

RESPONSE:

- a. Confirmed.
- b. Yes. Although the results of a more recent test for a production FSM-1000 have been made available, the test was not structured in the same manner as the Albany test with respect to segmenting the mailstream into Categories 1, 2, and 3 mail. Therefore, the Albany test provides the best data available on the jam rate of Category 1 mail on the FSM-1000.
- c. The missort rate for the FSM 881 is 0.001.

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NDMS/USPS-T26-7.

- a. Please refer to LR-H-169 and confirm that the misface rate for Category 1 mail fed on the FSM 1000 was 0.8 percent, 0.7 percent, and 1.2 percent for, respectively, operations 141, 143, and 146.
- b. Are these still the best data available on the misface rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.
- c. What are the comparable misface rates on the FSM 881s?

RESPONSE:

- a. Confirmed.
- b. Yes. Although the results of a more recent test for a production FSM-1000 have been made available, the test was not structured in the same manner as the Albany test with respect to segmenting the mailstream into Categories 1, 2, and 3 mail. Therefore, the Albany test provides the best data available on the jam rate of Category 1 mail on the FSM-1000.
- c. The Postal Service has no information responsive to this request.

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NDMS/USPS-T26-8.

- a. Please refer to LR-H-169 and confirm that the reject rate for Category 1 mail fed on the FSM 1000 was 0.2 percent, 0.2 percent, and 0.3 percent for, respectively, operations 141, 143, and 146.
- b. Are these the best data available on the reject rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.
- c. What are the comparable reject rates on FSM 881s?

RESPONSE:

- a. Confirmed.
- b. Yes. Although the results of a more recent test for a production FSM-1000 have been made available, the test was not structured in the same manner as the Albany test with respect to segmenting the mailstream into Categories 1, 2, and 3 mail. Therefore, the Albany test provides the best data available on the jam rate of Category 1 mail on the FSM-1000.
- c. The acceptance rates for the FSM 881 are provided in LR-H-134, Section 1, page 11 of 27. The reject rates equal 1 minus the acceptance rates.

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NDMS/USPS-T26-9.

- a. Please refer to LR-H-169 and confirm that the damage rate for Category 1 mail fed on the FSM 1000 was 0.07, 0.00, and 0.06 pieces fed, for, respectively, operations 141, 143, and 146.
- b. Are these the best data available on the damage rate of Category 1 mail on the FSM 1000? If not, please provide the best data available.
- c. What are the comparable damage rates on FSM 881s?

RESPONSE:

- a. Confirmed.
- b. Yes. Although the results of a more recent test for a production FSM-1000 have been made available, the test was not structured in the same manner as the Albany test with respect to segmenting the mailstream into Categories 1, 2, and 3 mail. Therefore, the Albany test provides the best data available on the jam rate of Category 1 mail on the FSM-1000.
- c. The Postal Service has no information responsive to this request.

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NDMS/USPS-T26-10.

- a. Please refer to LR-H-169, and after taking account of jam rates, missort rates, misface rates, reject rates, and damage rates, what is the net percent of **Category 1** mail that can be processed successfully on the FSM 1000 without any problem?
- b. What is the comparable net percent of **Category 1** mail that can be processed successfully on the FSM 881s without any problem?
- c. What is the net percentage of **Category 2** mail that can be processed successfully on FSM 1000s?
- d. What is the net percentage of **Category 2** mail that can be processed successfully on FSM 881s?
- e. What is the net percent of mail that is less or greater than the Model 881 machinable standard (manual case mail) that can be processed successfully on FSM 1000s?

RESPONSE:

- a. The net percentage of Category 1 mail that can be processed successfully on the FSM 1000 cannot be determined precisely, as some pieces can be (but are not necessarily) processed successfully in spite of a problem such as a jam, missort, misface, reject, or damage. For example, a piece can be rejected because it is in the wrong sort plan, but still processed successfully. Qualitatively, virtually all mail that is within the specifications of the FSM 1000 is processed successfully.
- b. Please refer to NDMS/USPS-T26-8(c).
- c. The net percentage of Category 2 mail that can be processed successfully on the FSM 1000 cannot be determined precisely, as some pieces can be (but are not necessarily) processed successfully in spite of a problem such as a jam, missort, misface, reject, or damage. For example, a piece can be rejected because it is in the wrong sort plan, but still processed

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successfully. Qualitatively, virtually all mail that is within the specifications of the FSM 1000 is processed successfully.

- d. The Postal Service has no information responsive to this request. The only existing data for the FSM 881 is for category 1 mail.
- e. The net percentage of manual case mail that can be processed successfully on the FSM 1000 cannot be determined precisely, as some pieces can be (but are not necessarily) processed successfully in spite of a problem such as a jam, missort, misface, reject, or damage. For example, a piece can be rejected because it is in the wrong sort plan, but still processed successfully. Qualitatively, virtually all mail that is within the specifications of the FSM 1000 is processed successfully.

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.

K N Hollies

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