

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Mail Processing Network :  
Rationalization Service : Docket No. N2012-1  
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORY TO  
POSTAL SERVICE WITNESS SMITH

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatory to Postal Service witness Smith: GCA/USPS-T9-14

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media). If necessary, an interrogatory may be redirected to another witness, or to the Postal Service, in the interest of a complete and accurate response.

February 24, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T9-14

On page 13, lines 11-13, of your testimony you discuss the number of DBCS machines currently (5,916), and the number after the new network is operational (3,165). However, the throughput of DBCS 7 machines is said to be 30 percent greater than DBCS 6 machines.

(a) Are both calculations you cite based on DBCS 6 machine throughputs? If your answer is “yes”, please answer parts (b) and (c) below. If it is not, please specify and describe the throughputs underlying these calculations

(b) Assuming DBCS 7 equipment is deployed nationwide by the time the new network is “full up”, please confirm that the number of DBCS to process the same volume would be reduced to 4,551 machines ( $5,916 / 1.3$ ). If you do not confirm, please explain.

(c) Please confirm that the elimination of 1,365 DBCS 6 machines due to the higher throughput of DBCS 7 machines could be accomplished without any change in current service standards. If you do not confirm, please explain.