

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
THE UNITED STATES POSTAL SERVICE

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:

Institutional interrogatory to the Postal Service: GCA/USPS-9

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 in the interest of a complete and accurate response.

February 24, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-9

In FY2011, the Postal Service was scheduled to widely deploy DBCS 7 equipment, which reportedly has a 30 percent greater throughput than the DBCS 6 equipment in use in FY2010.

(a) Did the conversion to DBCS 7 equipment in fact happen in FY2011?

(b) If your answer in (a) is “yes”, please confirm that 30 percent more mail per machine can be processed in order to meet the overnight delivery standard than was reflected in FY 2010 data. If you do not confirm, please explain.

(c) Would you agree that fewer DBCS 7 than DBCS 6 machines would be needed to process FY 2010 volumes of First-Class Letter Mail (FCLM)?

(d) In the transition to DBCS 7 machines, would you agree that the reduction in the number of DBCS needed can be obtained without changing current service standards? Please fully explain your answer, indicating, in case of a negative answer, whether a lesser change in current service standards than an extra day could enable the reduction in the number of machines.

(e) In the transition to DBCS 7 machines, would you agree that 30 percent greater throughput than the DBCS 6 machines reduces the constraints on current service standard windows in order to maintain overnight delivery for Single-Piece FCLM? (For example, with fewer machines than in a DBCS 6 regime, DBCS 7 equipment can more easily meet the workload peak in the 2:00 A.M. to 6:00 A.M. time period.) Please fully explain your answer.