

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS COOMBS
TO INTERROGATORIES OF NAA (NAA/USPS-T44-1 – 5, 8 - 11)
(July 14, 2006)

The United States Postal Service hereby provides the response of witness Coombs to the following interrogatories of NAA, filed on June 30, 2006: NAA/USPS-T44-1 – 5, 8 - 11. Questions 6 and 7 have been redirected to witness McCrery.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 14, 2006

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-1.

Please refer to your testimony at page 6, lines 16-20 and page 8, lines 9-13. Do you anticipate that the FSS being developed and tested in Carmel, Indiana, and that is expected to be deployed starting in 2008, will be able to sequence unbound High Density flats "wraps" bearing an address?

RESPONSE:

The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-2.

Are there any weight or other physical characteristics of High Density flats that will affect their ability to be run on the FSS? If so, please describe.

RESPONSE:

The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-744-3.

Please refer to your testimony at page 8, lines 9-11 and your response to VP/USPS-T44-2(a). Please clarify whether, or in what circumstances, you anticipate saturation flats mail will be processed by FSS in 2008.

RESPONSE:

The data from the testing of FSS has not been analyzed, and no information is currently available. It is anticipated that saturation mail may be put on the FSS machines if it is determined that it would be operationally efficient, but no final decision has been made.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-4.

Under current city and rural operations, by what time must a saturation flats mailing entered at a DDU arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. DDUs have differing operational hours and conditions. Many factors, including carrier reporting times, clerk and BBM staffing, and numerous other operational conditions would affect the time requirements and constraints. For example, if the saturation flat-pieces had a delivery operation window that included two or three acceptable delivery days, and if another saturation flat mailing was already assigned for delivery on the first day, it is possible that the saturation mailing would be delivered on the day following but still within the operational window. Conversely, if a mailing was received at the unit and distributed prior to carrier leaving times, and if the delivery window included the current day, it is possible that the saturation flat-pieces would be delivered on that day.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-5.

Under current city and rural carrier operations, by what tie must a High Density flats mailing entered at a DDU arrive in order to be delivered (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. DDUs have differing operational hours and conditions. Many factors, including carrier reporting times, clerk and BBM staffing, and numerous other operational conditions would affect the time requirements and constraints.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-8.

After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a city route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-9.

After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a rural route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-10.

After implementation of FSS sequencing, by what time and where would a saturation flats mailing need to be entered in order to be delivered on a city route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. The data from the testing of FSS has not been analyzed, and no information is currently available.

**RESPONSE OF POSTAL SERVICE WITNESS COOMBS TO
INTERROGATORIES OF NEWSPAPER ASSOCIATION OF
AMERICA**

NAA/USPS-T44-11.

After implementation of FSS sequencing, by what time and where would a High Density flats mailing need to be entered in order to be delivered on a rural route (assuming only one mailing):

- a. on the same day?
- b. no later than the next day?

RESPONSE:

a., b. The data from the testing of FSS has not been analyzed, and no information is currently available. (This question is identical to NAA/USPS-T44-9).

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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