

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

**Rate and Service Changes To Implement
Baseline Negotiated Service Agreement
With Bank of America Corporation**

Docket No. MC2007-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS AYUB (APWU/USPS T1-1-3)
(March 27, 2007)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness Ali Ayub. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T1-1 Please review the following quotes taken from recent Comprehensive Statements of the Postal Service:

“The ICS system is being added to all of our existing bar code sorters... When deployment is complete in early 2001, over 9,000 barcode sorters will be retrofitted with an ICS upgrade kit. The upgrade is increasing bar code sorter efficiency.” [CS 2000, page 46.]

“During 2003, 90 delivery barcode sorter-expanded capability machines were deployed, bringing the total number of DBCS-ECs to 94. The DBCS-EC machines can process a portion of letter mail that would otherwise require manual distribution. This equipment can handle a wider range of mail than previous barcode sorters...” [CS 2003, page 60.]

“Deployment of Wide Field of View (WFOV) cameras as replacements for the aging and obsolete wide area barcode readers (WABCR) started in 2003. ... The WFOV camera system demonstrated a significant improvement over the WABCR in reading POSTNET and PLANET barcodes. Deployment of over 9,000 WFOV cameras was completed in November 2003.” [CS 2003, page 61.]

“Letter mail automation capabilities were expanded significantly in 2006 with the addition of new barcode recognition and data collection functions to support marketing and Intelligent Mail efforts. Most of the letter mail processing equipment has been upgraded to support the tracking of inter-facility mail.” [CS 2006, page 36.]

- a) Please provide all studies, test results, or other documentation that measures or reports on any improvements in the efficiency of barcode sorters with these enhancements compared to barcode sorters prior to the installation of these enhancements.
- b) Please provide information on what percentage of the barcode sorters in the Postal Service have these enhancements now, what percentage can expect to have these enhancements within the next three years and what percentage had these enhancements in 1999.

APWU/USPS-T1-2 Are the calculated savings from mail processing improvements shown in your worksheets dependant on the Postal Service’s actual acceptance rate being equal to the acceptance rates shown in R2006-1 USPS-LR-L-110? Please explain your answer.

APWU/USPS-T1-3 If Bank of America’s current (unmeasured) acceptance rates are higher than the 96.8% and 96.9% baseline acceptance rates shown in the contract, will the Postal Service experience any actual savings from that portion of this contract over the “improvement” zone between the baseline and Bank of America’s actual rate?