

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

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RANEY TO
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-ST3-5)
(May 25, 2007)**

The United States Postal Service hereby provides the response of witness Raney to the following interrogatory of the American Postal Workers Union, AFL-CIO: APWU/USPS-ST3-5, filed on May 9, 2007. The interrogatory is stated verbatim and is followed by the response.

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RANEY TO
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO**

APWU/USPS-ST3-5. Based on your experience, what is the current average acceptance rate for pre-barcoded letter mail on a delivery barcode sorter?

RESPONSE:

Depending on the operation, the accept rates range from 97% to over 99%; the lower bound represents the accept rates at upstream operations. Average accept rates in operations where the mail is predominantly processed for the first time tend to be lower than in operations where mail has already been run multiple times upstream on our automated equipment. Because BAC's mail mix is predominantly 3-digit and 5-digit, its automation mail is likely to bypass upstream operations and receive its first pass in downstream mail processing operations. As a result, BAC's mail is more likely to experience lower than average accept rates as compared to other mail processed in that same operation that has been previously processed and accepted in an upstream operation, since the mail mix in downstream operations would presumably exclude pieces that were processed and rejected in upstream mail processing operations.

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.

Matthew J. Connolly

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