

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Repositionable Notes Market Test)

Docket No. MC2004-5

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS DARRON K. HOLLAND (OCA/USPS-T1- 16)
(August 16, 2004)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-8, dated July 29, 2004, are hereby incorporated by reference

Respectfully submitted,

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OCA/USPS-T1-16. Please refer to Library Reference 2, “Materials in Response to Interrogatories OCA/USPS-T1-5 and OCA/USPS-T1-6.”

- a. Please confirm that the Mail Toppers Test (pp 1- 6 of LR 2) yielded results such as “Significant Damage to Post-it” and “Post-It Note Moved.”
 - i. If you do not confirm, explain why not.
 - ii. If you do confirm, then doesn't it seem plausible that significantly damaged Post-its and movement of Post-its could eventually produce machine jams? Please explain any negative answer.
- b. Please confirm that at page 8 of LR 2, the statement is made, “After completing each machine processing run significant Post-It Note paper fiber and scraps were noted in the machine separation and address reading areas. The 8 missing Post-It notes were found in these areas.”
- c. With respect to the statement set forth in part (b), doesn't it seem plausible that paper fiber, scraps, and detached Post-It Notes might cause machine jams? If you do not agree, please explain.
- d. With respect to the statement set forth in part (b), doesn't it seem plausible that significant increases in paper fiber, scraps, and detached Post-It Notes will cause an increase to maintenance costs? If you do not agree, please explain. If you do agree, what are the Postal Service's plans to collect information on increased maintenance costs during the provisional period?
- e. Please confirm that pages 19 – 20 of LR 20 contain photos following RPN tests with the following captions:
 - “Yellow Post it Note Pieces in Machine Induction Area”

- “Yellow Post it Note pieces/fibers in the machine reader area”

If you do not confirm, please explain why not.

- f. Please confirm that page 2 of LR 2 , the test observation form for the “No. 10 Envelope with Adhesive on Right Hand Edge,” includes the statement, “Damage to notes start on right leading edge, Initially nicks, later torn back, peeled off.”
- i. If you do not confirm, explain why not.
- ii. If you do confirm, then doesn't it seem plausible the nicked, torn back, and peeled off RPNs could eventually produce machine jams? Please explain any negative answer.
- g. Please confirm that pages 2 – 6 of LR 2 report that there is much more significant damage to Post-it Notes that are placed along the Right Hand Leading Edge as compared to Post-it Notes that are placed along the top Horizontal Edge. If you do not confirm, please explain why not.
- h. Please refer to page 8 of LR 2. Please confirm that Test 2 includes the statement, “Envelopes with yellow Post-It Notes having adhesive on the right leading vertical edge, experienced a total of 120 rejects, above the 111 limit, resulting in test failure.”
- i. Please confirm that on page 8 of LR 2, it is reported that, “The failed outcome of envelopes with Notes having adhesive on the leading vertical edge was unexpected.” Also confirm that out of 62 envelopes with white Post-It Notes “repositioned so that the adhesive edge was on the right vertical leading edge,” there were 22 rejects out of an initial 62 pieces. If you do not confirm, please explain why not.

- j. Also confirm that 82 envelopes with yellow Post-It Notes “having adhesive initially on the right vertical leading edge were repositioned so that the adhesive was on the top horizontal edge;” and that such an orientation resulted in “all 82 pieces . . . run through the DBCS three times with no failures.” (LR 2 at page 8) If you do not confirm, please explain why not.
- k. Confirm that the overall conclusion from the 8/29/00 test at Merrifield (LR 2 at 8) is: “Based on test results it appeared that note adhesive orientation was important. The color of the note did not appear to be the issue, the adhesive orientation did.” If you do not confirm, please explain.
- l. In light of the observations noted in parts (f) – (k) of in instant interrogatory, does the Postal Service allow placement of RPNs in any orientation other than with the adhesive edge running parallel to the top of the host mailpiece? If so, why? If not, what provisions of the DMM require placement of the RPN solely with the adhesive strip running parallel to the top edge of the host mailpiece?
- m. For mailpieces not hosting RPNs, how common is it for pieces of envelopes to be torn off and shredded? Do such incidents cause jams in Multiline Optical Character Reader (MLOCR) and Bar Code Sorter (BCS) equipment? Please discuss.
- n. On March 6, 2002, Susan Campbell, Manager, Product Management – Letters, wrote to Plant Managers and District Managers, Business Mail Entry. She informed them of the RPN Pilot Test and attached a “Repositionable Notes Feedback Form.” (LR 2 at 21- 23).

- i. How many of the Repositionable Notes Feedback Forms were returned to Ms. Campbell?
- ii. Are the results of forms returned to Ms. Campbell contained in LR 2? If so, please cite the pages containing the results of returned Repositionable Notes Feedback Forms. If not, please provide the form results.