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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96--3

RESPONSE OF UNITED STATES POSTAL SERVICE
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 4,
(QUESTIONS 13, 14, AND 16(a)-(b) and (d)-(e))
(October 18, 1996)

The United States Postal Service hereby provides responses to the following questions of Presiding Officer's Information Request No. 4, filed on October 2, 1996: 13, 14, and 16(a)-(b) and (d)-(e). On October 15, 1996, the Postal Service filed responses to questions 7, 8, 9, and 12, on October 16, 1996, the Postal Service filed a response to question 17, and on October 17, 1996, the Postal Service filed responses to questions 11 and 15. A motion for extension of time to respond to remaining questions 1-6, 10, and 16(c) is being filed today.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

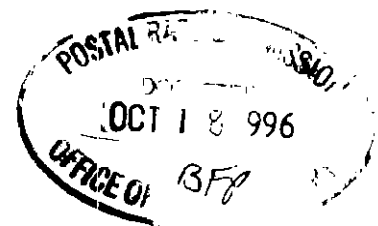
By its attorneys:

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October 18, 1996



**RESPONSE OF WITNESS LYONS TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 4**

13. Refer to LR-SSR-121, WP B (Revised 7/26/96) , Table 4.
- a. Please show step-by-step how you derived the -13 percent and the 10 percent growth factors for Special Handling transactions.
 - b. Please explain if it is proper to use the growth rates of both bulk and single piece in deriving the growth factor for fourth-class Special Handling.

RESPONSE:

- a. Both figures are in error. The growth factors were mistakenly lifted from an earlier forecast during case preparation. As specified in footnote 6 of workpaper B, the correct figures are calculated using GFY 1995 and forecasted GFY 1996 volumes from library reference SSR-102.

For Third Class Single Piece the calculation is as follows:

$$(111.865-129.505)/129.505=-13.6 \text{ percent}$$

For Fourth Class the calculation is as follows:

$$((224.482+525.693+242.719+22.799)-(221.832+466.617+218.581+29.509))/(221.832+466.617+218.581+29.509)=8.5 \text{ percent}$$

As shown in the attached revised workpaper D, the resulting total special handling pieces for the test year is 243,770. This is only 2,984 pieces less than the special handling TY total pieces (246,754) in the original workpaper B.

**RESPONSE OF WITNESS LYONS TO
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Question 13, Page 2 of 2

- b. Special Handling can be used for all third and fourth Class (Standard) mail.

For the purpose of estimating test year special handling pieces, it was assumed that without a Special Handling fee change the total volume would grow at the same rate as the subclasses that utilize Special Handling. As the volume of Special Handling is very low, it is difficult to develop a statistical crosswalk between Special Handling and the subclasses of mail. Within third class it was assumed that use of Special Handling is predominately in single piece, for which expedited dispatch is probably more desirable than bulk subclasses. In the case of fourth class, the high value nature of all categories, both single piece and bulk categories, leads one to the conclusion that Special Handling is likely to be used across all subclasses. It is, therefore, proper to use the growth rates of both bulk and single piece in deriving the growth factor for fourth-class Special Handling, as has been done in prior dockets. See, for example, USPS-T-22, WP-14, page 1, in Docket No. R90-1.

Migration of Special Delivery Volume

USPS-T-1, WP B
(Revised 10/18/96)

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Purpose. With the elimination of special delivery, 104,000 pieces are expected to migrate to Express Mail. The purpose of this workpaper is to develop an adjustment to Test Year volumes to account for this migration. The adjustment uses RPW special delivery piece data by general class groupings (Table 1). In turn, piece volumes are assigned to subclasses based on RPW subclass volume split factors (Table 2).

Table 1 Assignment of Transactions to Classes			
Class of Mail	FY95 Special Delivery Transactions 1/	Category Assignment	
First-Class & Priority			
Not over 2 lbs.	244,255	1C+Priority	
Over 2 lbs. but not over 10 lbs.	14,038	Priority	
Over 10 lbs.	1,444	Priority	
Subtotal	259,737		
Other Classes			
Not over 2 lbs.	9,773	3rd+PP	
Over 2 lbs. but not over 10 lbs.	6,976	Parcel Post	
Over 10 lbs.	1,362	Parcel Post	
Subtotal	18,111		
Total Domestic	277,848		
Table 2 Split Factors to Assign Transactions to Subclasses			
	Pieces 2/ (000)	% Dist. Factor	
First Class Single Piece Letters	55,049,377	99.0%	
Priority Not Over Two Pounds	572,555	1.0%	
Total	55,621,932	100.0%	
Third Class Single Piece	179	0.4%	
Parcel Post Not Over Two Pounds	47,343	99.6%	
Total	47,522	100.0%	
Table 3 Distribution of Migrated Transactions from Subclasses			
Subclasses	Adjusted 3/ FY95	% Distribution	TYAR Adjust. to Subclasses
1C - Letters & Parcels	241,741	87%	90
Priority	17,996	6%	7
3C - Single Piece Rate	8,375	3%	3
Parcel Post	9,736	4%	4
Total	277,848	100%	104 4/
Table 4 Special Handling Test Year Volume Projection based on Class Growth			
Purpose: To estimate TY96 Special Handling volume by applying growth factors for FY95 to FY96.			
	FY95 Pieces 5/	Volume Factor 6/	TY Pieces
Third Class Single Piece	64,981	-13.6%	56,144
Fourth Class	172,928	8.5%	187,627
Total	237,909		243,770

Footnotes:

1/ USPS-LR-SSR-43, Section VII; Other Classes - Not Over 2 lbs. includes Mail Categories 8760 and 8730.

2/ Source: FY94 Billing Determinants

3/ Table 1 "1C+Priority" and "3rd+PP" volume apportioned to subclasses based on Table 2 split factors plus assigned volume in Table 1.

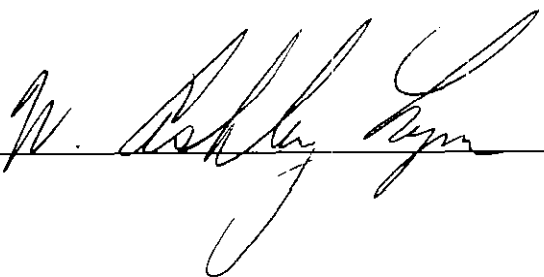
4/ USPS-LR-SSR-101

5/ USPS-LR-SSR-43, Section VII.

6/ USPS-LR-SSR-102 Third Class Single Piece and Fourth Class % change GFY 1995 to GFY 1996

DECLARATION

I, W. Ashley Lyons, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



W. Ashley Lyons

Dated: 10-18-96

Answer of Richard Patelunas to
Presiding Officer's Information Request No. 4
to United States Postal Service

POIR No. 4 Question 14. Encirclement Rules

a. Rule No. 13. This rule applies to a situation where the special service is certified mail, there is no other special service on the mail piece, the uniform operation code is postage due (00), platform acceptance (07), window service (09), or other accountable work (23), and a clerk or mailhandler is involved. Since there is only one special service, certified mail, the subclass of mail must be First-Class or Priority because only these two subclasses are eligible for certified mail.

(1) With respect to postage due, the rule does not distinguish between postage due for the First-Class Mail or Priority Mail postage versus postage due for the certified mail fee. What is the rationale for assigning the postage due cost only to certified mail?

(2) With respect to platform acceptance, since the mailing is likely to be a bulk mailing and since there also will be a mailing statement, what is the rationale for assigning the acceptance cost only to certified mail rather than First-Class Mail or Priority Mail? The acceptance clerk has to take time to check both the postage and the certified fee and none of the criteria in the rule indicate the clerk was working only on the certified mail fee at the time of the IOCS observation.

b. Rule No. 21. This rule differs from rule no. 13 only in that more than one special service is present on the mail piece. With respect to postage due and platform acceptance, what is the rationale for selecting certified mail rather than the other special services or the subclass of mail?

POIR No. 4 Question 14 Response.

(1) There is no way to distinguish between the amount of postage applied for the class of mail and the amount of postage applied for the special service. It is my understanding that the underlying assumption is that it is most likely that the postage for the class of mail is correct and that any short-paid amount is the result of a miscalculation relating to the special service.

Answer of Richard Patelunas to
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POIR No. 4 Question 14 Response continued.

(2) Please refer to USPS-LR-SSR-12, In-Office Cost Systems Field Operating Instructions, pages 56 - 57 for a description of the circumstances in which platform acceptance (07) is selected in IOCS. The statement that the situation would "likely be a bulk mailing and since there also will be a mailing statement" is questionable. If there is only one special service involved and it is certified, there are numerous opportunities for this to be other than a bulk mailing. For instance, consider the following categories from page 57:

- b. Receiving Mail From Customer on Platform-Other Than Weighing Section
- c. Caller Service
- d. Accepting Plant-Loaded Mail-Detached Mail Unit

It is my understanding that under such situations, it is reasonable to assume that the clerk would be working only on certified mail at the time of the IOCS observation.

b. The same rationale applied to Rule 13 applies to Rule 21. It is my understanding that the special service beside the certified feature is assumed to be subordinate to the certified feature. As such, the focus of the IOCS observation is on the certified Special Service Code.

Answer of Richard Patelunas to
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POIR No. 4 Question 16.

In response to Presiding Officer's Information Request No. 3, question 7, witness. Patelunas states that "...the special study is meant to capture costs that may not be captured in the CRA as return receipt costs." He also states that a portion of return receipt costs are included in U.S. Postal Service penalty mail attributable costs as well as in "other" special services. Further, he observes that the city carrier street cost system does not collect information on the time a carrier spends obtaining a signature on return receipt.

a. Please provide the amount of attributable cost included in USPS penalty mail that is properly assignable to return receipt. Please provide the source or the workpapers supporting this cost figure.

b. Please provide a complete list of cost segments and components showing where return receipt costs are included and whether the amount is identified or not identified with return receipt by the CRA system.

d. Patelunas' Exhibit USPS-T-5A, page 28, shows zero attributable dollars for other special services with respect to elemental load time and other load time. In response to POIR No. 3, Question 7, Patelunas states that the city carrier data system does not collect the additional time a carrier needs to obtain a signature on return receipt cards. This implies that the cost associated with this activity is captured as part of total load time, but the portion attributable to obtaining signatures is not specifically identified. Is this non-identified amount distributed to mail categories other than return receipt or does the Service adjust the total attributable load time cost to remove the non-identified amount attributable to return receipt before distribution to the other mail categories. If the Service does not adjust the load time attributable cost to remove the portion attributable to return receipt for obtaining signatures, provide a rationale for not adjusting this cost.

e. In response to OCA/USPS-T8-18 and POIR No. 4, Question 7, Patelunas states that a portion of attributable return receipt costs are contained in the attributable costs for U.S. Postal Service penalty mail. He also states that the special study is intended to capture this attributable cost for return receipt. Because U.S. Postal Service penalty mail attributable costs are added to institutional costs, the implication is that some attributable costs for return receipt are borne by all mail categories. Does the Postal Service adjust the institutional costs so that this is not the case? If not, what is the rationale for distributing some portion of return receipt attributable cost to all mail categories?

Answer of Richard Patelunas to
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POIR No. 4 Question 16 Response.

a. The level of detail required to calculate the amount of attributable cost included in USPS penalty mail that is properly assignable to return receipt is not available.

b. Attachment 1 to this response is a list of the segments and components that include the costs of return receipts as reflected in the CRA. The components marked with an "X" are the direct costs or the piggyback costs that include return receipt costs. There is also a function column specifying whether the costs are: acceptance, collection and delivery, mail processing, purchased transportation or other. In the discussion below, it is assumed that between the point of acceptance and the point of signature by the addressee, the return receipt (Form 3811) is indistinguishable from the parent piece that it accompanies. From the point of signature by the addressee to the delivery to the original sender, the unattached Form 3811 is identified as a piece of mail. It must be noted that the only costs reported specifically for return receipts are shown in my workpaper WP-C LIOCATT Reports 1 - 4.

There are a variety of means by which return receipts enter the mail stream. The Acceptance function in Attachment 1 is for acceptance from customers by Postmasters, Window clerks and Mail Processing clerks. Return receipts also enter the mail stream via the collection functions of City Carriers,

Answer of Richard Patelunas to
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POIR No. 4 Question 16 Response continued.

Vehicle Service Drivers, and Rural Carriers and these appear as the Collection and Delivery function in Attachment 1. Postmaster costs are distributed on Revenue, Pieces and Weight (RPW) revenues. In RPW, return receipt revenues are included in the revenues for the following special services: certified, registry, insurance and COD. Therefore, return receipt costs for return receipts are reflected in those same special services. Window Service and Mail Processing Platform return receipt costs are shown in LIOCATT separately and appear as the special service "Other" in the segments and components shown in Attachment 1. City Carrier, Vehicle Service Drivers and Rural Carriers accept return receipts into the mail stream via their collection activities; thus, the class of mail or special service with which the return receipt is associated would reflect the acceptance cost of the return receipt.

The next point at which the Form 3811 would be recognized is at the time of signature and delivery. Postmaster, Window Service and Mail Processing costs would be recorded in the same manner as acceptance discussed above. City Carrier and Special Delivery Messenger return receipt costs would be reflected in the special services: certified, registry, insurance and COD. Rural Carrier costs appear as "Other" special service. Also, the City Carrier In-Office time associated with return receipts, unattached Form 3811, would be captured by IOCS as "Other" special service.

Answer of Richard Patelunas to
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POIR No. 4 Question 16 Response continued.

The Mail Processing cost of returning the return receipt through the mail stream is recorded as "Other" special service in IOCS and is separately reflected in LIOCATT. The purchased transportation cost of returning the return receipt through the mail stream is recorded as U.S. Postal Service penalty mail.

Delivering the return receipt to the original sender is handled in the following manner. Postmaster delivery would be reflected in the special services cited above for acceptance. Window Service, Mail Processing and City Carrier In-Office would be reflected in IOCS. Rural Carrier delivery would be shown as "Other " special service and City Carrier delivery would be shown as U S. Postal Service penalty.

The other costs associated with return receipts are the printing costs and the piggyback costs. The printing costs are in Other Miscellaneous in segment 16 and the piggyback costs are displayed in Attachment 1 to this response.

d. Although not separately identified in the carrier cost system, the signature time for return receipts is a portion of the total load time cost pool. Elemental load time is based on shape; that is, the Postal Service estimates the effect of volume on load time by several shape categories, including

Answer of Richard Patelunas to
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POIR No. 4 Question 16 Response continued.

accountables (see Patelunas Workpaper B-7, W/S 7.0.4.2, line 59, column 9).

The load time attributed to accountables includes the time it takes to obtain signatures. This load time is distributed to the special services: registry, certified, insurance and COD. As such, the signature time costs are distributed to the special services with which the return receipts are associated. Other load time is handled similarly.

e. There is no need to adjust the institutional costs for return receipt. A portion of return receipt costs is not distributed to all mail categories as the question states. Rather, the special study provides attributable costs for return receipts for pricing purposes. The return receipt fee covers these attributable costs as well as the contribution to institutional costs.

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			Function	USPS	Insured	Certified	Registry	COD	Other
1. POSTMASTERS									
POSTMASTERS	EAS 23 & BELOW	(1 1)	A		X	X	X		
POSTMASTERS	EAS 24 & ABOVE	(1 2)	O						
GENERAL	MGRS AT BMCS	(1 3)	O						
TOTAL	C/S 01								
2. SUPERVISORS AND TECHNICIANS									
MAIL	PROCESSING	(2.1)	MP						X
CENTRAL MAIL	MARKUP	(2.1)	MP	X					X
WINDOW	SERVICE	(2.2)	A						X
ADMIN & SUPPORT	ACTIVITIES	(2.3)	O	X					X
CITY DELIVERY	CARRIERS	(2.4)	CD	X	X	X	X	X	X
SPECIAL DELIVERY	MESSENGERS	(2.4)	CD			X	X		
RURAL DELIVERY	CARRIERS	(2.4)	CD						X
VEHICLE	SERVICE	(2.4)	CD	X					
EMPLOYEE &	LABOR RELATIONS	(2.5)	O						X
HIGHER LEVEL	SUPERVISORS	(2.5)	O						X
GENERAL SUPV OF	MAIL PROCESSING	(2.5)	MP						X
GENERAL SUPV OF	COLLECT/DELIVERY	(2.5)	CD						X
SUPERVISOR	TRAINING	(2.5)	O						
QUALITY CONTROL	REVENUE PROTECT	(2.5)	O						X
JOINT SUPV	CLERKS/CARRIERS	(2.5)	O						X
OTHER		(2.5)	O						X
TOTAL	C/S 02								
3 CLERKS AND MAIL HANDLERS--CAGS A-J									
MAIL PROCESS	DIRECT LABOR	(3 1)	MP						X
MAIL PROCESS	OVERHEAD	(3 1)	MP						X
MAIL PROCESS	FIXED	(3.1)	MP						
WINDOW SERVICE		(3.2)	A						X
ADMINISTRATIVE	CLERKS	(3.3)	O						X
TIME AND	ATTENDANCE	(3.3)	O						X
SPECIFIC	FIXED	(3.3)	O						
TOTAL	C/S 03								
4 CLERKS, CAG-K									
	POST OFFICES	(4 1)	MP						X
6. CITY DELIVERY CARRIERS, OFFICE									
IN-OFFICE	DIRECT LABOR	(6.1)	CD						X
TRINING, VEH	PREP & KEY HNDLG	(6 2)	CD						X
CAG K		(6 2)	CD						X
IN-OFFICE	SUPPORT	(6 2)	CD						X
TOTAL	C/S 06								
7 CITY DELIVERY CARRIERS, STREET									
ROUTE		(7 1)	CD						
ACCESS		(7 2)	CD	X					
ELEMENTAL	LOAD	(7.3)	CD	X	X	X	X	X	
OTHER	LOAD	(7.4)	CD	X	X	X	X	X	
STREET	SUPPORT	(7.5)	CD	X	X	X	X	X	X
TOTAL	C/S 07								
8. VEHICLE SERVIC E DRIVERS									
TOTAL	C/S 08		CD	X					
9 SPECIAL DELIVE RY MESSENGERS									
OFFICE		(9 1)	CD			X	X		
STREET		(9.2)	CD			X	X		
EQUIP MAINT	ALLOWANCE	(9.3)	CD						
SPECIAL	DELIVERY FEES	(9 4)	CD						
TOTAL	C/S 09								

			Function	USPS	Insured	Certified	Registry	COD	Other
10 RURAL CARRIER	S								
EVALUATED	ROUTES	(10 1)	CD						X
OTHER	ROUTES	(10.2)	CD						X
EQUIP MAINT	ALLOWANCE	(10.3)	CD						
TOTAL	C/S 10								
11. CUSTODIAL AND	MAINTENANCE SERV								
CUSTODIAL	PERSONNEL	(11 1 1)	A,CD,MP,O	X	X	X	X	X	X
CONTRACT	CLEANERS	(11 1.2)	A,CD,MP,O	X	X	X	X	X	X
OPER EQUIP	MAINTENANCE	(11 2)	A,CD,MP,O	X	X	X	X	X	X
PLANT & BUILDING	EQUIP MAINT	(11 3)	A,CD,MP,O	X	X	X	X	X	X
TOTAL	C/S 11								
12. MOTOR VEHICLE	SERVICE								
PERSONNEL		(12.1)	CD	X	X	X	X	X	X
SUPPLIES &	MATERIALS	(12.2)	CD	X	X	X	X	X	
VEHICLE	HIRE	(12.3)	CD	X	X	X	X	X	
TOTAL	C/S 12								
13. MISCELLANEOUS	OPERATING COSTS								
CONTRACT	STATIONS	(13 1)	A,CD						
CARFARE		(13.2)	CD,O	X	X	X	X	X	
DRIVEOUT		(13.2)	CD,O	X	X	X	X	X	
TOLLS &	FERRIAGE	(13.2)	O						
FED RESERVE &	COMMERCIAL BKS	(13.3)	O						
EMPLOYEE	AWARDS	(13.4)	O						
EQUIPMENT	SHOPS	(13 5)	O						
CAG L RENTAL	ALLOWANCE	(13 6)	O						
OTHER LOCAL	OPERATIONS	(13.7)	O						
TOTAL	C/S 13								
14 TRANSPORTATIO	N								
DOMESTIC	AIR	(14 1)	T	X					
HIGHWAY		(14 1)	T	X					
RAILROAD		(14 1)	T	X					
DOMESTIC	WATER	(14.1)	T	X					
INTERNATIONAL			T	X					
TOTAL	TRANSPORTATION								
15 BUILDING OCCU	PANCY								
RENTS		(15.1)	A,CD,MP,O	X	X	X	X	X	X
FUEL &	UTILITIES	(15 2)	A,CD,MP,O	X	X	X	X	X	X
COMMUNICATIONS	& OTHER	(15.3)	O						
TOTAL	C/S 15								
16 SUPPLIES AND	SERVICES								
STAMPS &	DISPENSERS	(16.1)	O						
MONEY	ORDERS	(16.1)	O						
EMBOSSSED STAMPED	ENVELOPES	(16 1)	O						
SUPPLY	PERSONNEL	(16.2)	A,CD,MP,O	X	X	X	X	X	X
CUSTODIAL &	BUILDING	(16 3.1)	O						X
EQUIPMENT		(16.3.2)	O						X
COMPUTERIZED	TRACKING/TRACING	(16.3 3)	O						
OTHER	MISCELLANEOUS	(16.3 4)	O						
ADVERTISING		(16 3.5)	O						
REMOTE	ENCODING S&S	(16 3.6)	O						
TOTAL	C/S 16								

			Function	USPS	Insured	Certified	Registry	COD	Other
18. ADMINISTRATIVE AND REGIONAL OP									
HEADQUARTERS		(18 1.1)	O						
MONEY ORDER	DIVISION	(18 1.1)	O						
AREA	ADMINISTRATION	(18 1.1)	O						
POSTAL	INSPECTION SERV	(18 1.2)	A,CD,MP,O	X	X	X	X	X	X
SUPPLIES &	SERVICES	(18 2.1)	O						
MISCELLANEOUS	SUPPORT	(18 2.2)	O						
INSP EXPENSES &	EMPLOYEE LOSSES	(18 2.3)	O						
REIMBURSEMENTS		(18 2.4)	O						
INDIVIDUAL	AWARDS	(18 2.5)	O						
MISC PERSONAL	COMPENSATION	(18 2.6)	O						
MONEY	ORDERS	(18 2.7)	O						
REPRICED	ANNUAL LEAVE	(18 3.1)	O						X
HOLIDAY	LEAVE	(18 3.1)	O						X
CIVIL SERVICE	RETIREMENT	(18 3.2)	O						X
FERS	RETIREMENT	(18 3.3)	O						X
WORKERS'	COMPENSATION	(18 3.4)	O						X
UNEMPLOYMENT	COMPENSATION	(18 3.5)	O						X
RETIREE HEALTH	BENEFITS	(18 3.6)	O						X
ANNUITANT	LIFE INSURANCE	(18 3.7)	O						
ANNUITANT COLA/	PRINCIPAL	(18 3.8)	O						X
ANNUITY	PROTECT PROGRAM	(18 3.9)	O						
TOTAL									
20 OTHER ACCRUED	EXPENSES								
EQUIPMENT	DEPRECIATION	(20 1)	MP						X
VEHICLE	DEPRECIATION	(20.2)	CD	X	X	X	X	X	
BLDG & LEASEHLD	DEPRECIATION	(20.3)	A,CD,MP,O						X
INDEMNITIES		(20.4)	O						
INTEREST	EXPENSE	(20.5)	O	X	X	X	X	X	X
OTHER EXPENSES	& CREDITS	(20.6)	O						
TOTAL									
	Function		Symbol						
	Acceptance		A						
	Collection & Delivery		CD						
	Mail Processing		MP						
	Purchased Transport		T						
	Other		O						

DECLARATION

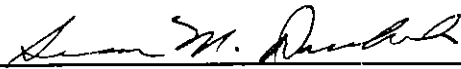
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 10-18-96

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
October 18, 1996