

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001**

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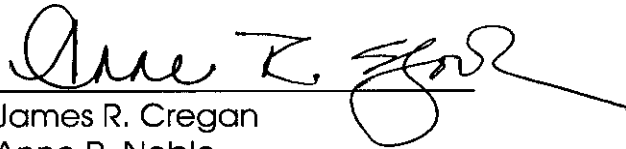
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**THIRD SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO USPS WITNESS KINGSLEY  
(MPA/USPS-T10-8-22)**  
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**(MARCH 10, 2000)**

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS Witness Kingsley (MPA/USPS-T10-8-22).

Respectfully submitted,



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**THIRD SET OF INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA  
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY.**

**MPA/USPS-T10-8.** For each of the years in the period 1987-1999, please provide the following, for each route type (e.g., business curblin, residential park & loop):

- (a) The year-end total number of city routes.
- (b) The number of city carrier hours that were spent as in-office and out-of-office time.
- (c) The year-end total number of city carriers.

**MPA/USPS-T10-9.** For each of the years in the period 1987-1999, please provide the year-end number of delivery units (e.g., offices, stations, branches) which serve city carrier routes.

**MPA/USPS-T10-10.** What proportion of city carrier routes were restructured (redesigned) during each of the years in the period 1987-1999? If possible, please provide this information separately for each route type.

**MPA/USPS-T10-11.** On pages 26-27, you state that "DPS reduces office time by saving each carrier up to 1 ½ hours a day for casing letters. This time was captured by reducing overtime or assistance that had been provided the carrier."

- (a) Please provide all documentation for the 1 ½ hour estimate.
- (b) For what time period has this savings been estimated?
- (c) For the time period in (b), please quantify the savings in terms of system-wide office time savings caused by DPS.
- (d) For the time period in (b), please quantify the increase in system-wide out-of-office time caused by DPS.
- (c) Please explain how this relates to the additional 25 minutes on the street that has been incurred since FY88.

**MPA/USPS-T10-12.** Was "auxiliary assistance," as the term is used on page 27 of your testimony, included in city carrier out-of-office time during the period 1994-1999? If not, please identify the cost component in which it was included.

**MPA/USPS-T10-13.** Was "router time," as the term is used on page 27 of your testimony, included in city carrier in-office time during the period 1994-1999? If not, please identify the cost component in which it was included.

**MPA/USPS-T10-14.** On page 27, you state that DPS and the resultant route restructuring has "eliminated 3,200 routes outright nationwide, and avoided approximately 3,000 to 4,000 new routes that would have otherwise been created due to the growing number of delivery points."

- (a) Over what time period has this route restructuring taken place?
- (b) For what time period has this savings in number of routes occurred?
- (c) Please provide all documentation available to demonstrate that 3,200 routes have been eliminated and 3,000-4,000 new routes have been avoided.

**MPA/USPS-T10-15.** Please provide any estimates you may have as to the volumes of DPS and non-DPS letters that are delivered by city delivery carriers.

**MPA/USPS-T10-16.** On page 27, you state that "some older developments" have been converted to cluster boxes.

- (a) Please provide all documentation as to how that has been achieved and the time period over which it was achieved.
- (b) Please quantify the number of conversions (in terms of delivery points, if possible) for the time period in (a).
- (c) If the same is true for other types of delivery (e.g., curblines), please identify that and provide all documentation as to how that was also achieved and the time period over which it was achieved.
- (d) If the same is true for other types of delivery, please quantify the number of conversions for the time period in (c).

**MPA/USPS-T10-17.** On page 27, you state that "DPS implementation allowed for additional handling costs on DPS letters, calculated as one hour per 5000 pieces of DPS."

- (a) Please provide all documentation for that productivity figure.
- (b) Please provide the Decision Analysis Report mentioned in footnote 10 on page 27 and please explain why you believe it is "conservative".
- (c) Please provide all documentation quantifying or discussing the effect of DPS volume on out-of-office time.
- (d) Please explain fully what you mean by "residual handling" as used in Footnote 10 on page 27.
- (e) Is the following considered out-of-office time: when carriers go to a rack to pick up their trays of DPS, verify that it is their mail and that it is in accurate walk sequence? Please explain.

**MPA/USPS-T10-18.** On page 27, you state that: "there were 5.6 pieces per delivery in FY98 compared to only 5.1 in FY88."

- (a) Please provide all documentation and calculations to support those figures.
- (b) Please identify the type of delivery(ies) described in this statement (e.g., SDR, MDR, B&M).
- (c) For both averages (5.6 and 5.1), please provide the breakdown in terms of non-DPS letters, DPS letters, flats, parcels, and accountables.

**MPA/USPS-T10-19.** With respect to your statement on page 28 that: "... comparing FY88 to FY98 ... today's city carriers average an additional 25 minutes on the street delivery 8 percent more mail to 2 percent fewer delivery points, most of which are centralized or on curblane routes. . .," please provide the following:

- (a) All documentation, assumptions, and calculations supporting your statement.
- (b) A clear explanation and quantification of how much of the additional 25 minutes is caused by DPS rather than additional volume.

- (c) A clear explanation and quantification of how much of the additional 25 minutes is caused by increases in deliveries that require direct interaction with the recipient, such as those for large parcels, multiple parcels, and accountables.
- (d) A clear explanation and quantification of how much of the additional 25 minutes is caused by increases in the fixed time to access centralized delivery locations (e.g., contained in locked/gated communities, large high-rises, industrial parks, etc.) and open locked central delivery boxes.

**MPA/USPS-T10-20.** Over the past twelve years, what has been the USPS policy with respect to:

- (a) The size, shape, or placement of new delivery receptacles?
- (b) The replacement or relocation of older receptacles?
- (c) The adequacy of streets and roads over which a city carrier must travel to deliver his route?

**MPA/USPS-T10-21.** Please provide your opinion, rationale, and all available documentation on the following questions:

- (a) Has the average access time to a curbline stop changed from FY88 to FY98? If so, in what way?
- (b) Has the average access time to a park & loop stop changed from FY88 to FY98? If so, in what way?
- (c) Has the average access time to a dismount stop changed from FY88 to FY98? In so, in what way?
- (d) Has the average access time to a foot stop changed from FY88 to FY98? If so, in what way?

**MPA/USPS-T10-22.** Has total (system-wide) city carrier run time (i.e., route plus access time) changed between FY88 and FY98 for each of the following sets of delivery types? If so, in what way? Please provide your opinion, rationale, and all available documentation.

- (a) Curbline deliveries

- (b) Park and loop deliveries
- (c) Dismount deliveries
- (d) Foot deliveries
- (e) Central Deliveries

**MPA/USPS-T10-23.** For each of the following route types, has average time to travel between the delivery unit and the route changed between FY88 and FY98? If so, in what way? Please provide your opinion, rationale, and all available documentation.

- (a) Curblin routes
- (b) Park and loop routes
- (c) Dismount routes
- (d) Central routes
- (e) Foot Routes

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.

  
Anne R. Noble

Washington, D.C.  
March 9, 2000