

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LINDA A. KINGSLEY (OCA/USPS-T10-1-2)
March 17, 2000

Pursuant to sections 26 and 27 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-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T10-1. Please refer to your testimony at page 8, lines 9-10.

- (a) What portion of the 88.3 percent of all letters that were barcoded are First-Class
 - (i) Automation Presort Letters and Parcels, and
 - (ii) Automation Carrier Route Letters.
 - (iii) Please provide the volumes for the mail identified in subparts (i) and (ii) of this interrogatory.

- (b) What portion of the 88.3 percent of all letters that were barcoded are Standard
 - (A) Regular
 - (i) Automation Category Letters, and
 - (ii) ECR Subclass Letters.
 - (iii) Please provide the volumes for the mail identified in subparts (i) and (ii) of this interrogatory.

- (c) Show all calculations used to derive the "88.3 percent," and provide citations for all figures used in the calculations.

- (d) Please confirm that data exists to calculate the percent of all letters that were barcoded in AP 1 through AP 12 of FY 99. If you do not confirm, please explain.

- (e) Please confirm that data exists to calculate the percent of all letters that were barcoded in AP 1 through AP 13 of Fiscal Years 1996, 1997 and 1998. If you do not confirm, please explain.

- (f) Please calculate the percent of all letters that were barcoded for the Accounting Periods (AP) identified in parts (d) and (e) of this interrogatory. Show all calculations and provide citations for all figures used in the calculations. Also

please provide the data identified in parts (d) and (e) of this interrogatory in hardcopy and electronic formats.

OCA/USPS-T10-2. Please refer to Chapter III, entitled "Staffing and Complement," of your testimony.

- (a) Please confirm that the single-piece First-Class mail volume fluctuates by the
- (i) day of the week,
 - (ii) week of the month, and
 - (iii) month of the year.

If you do not confirm, please explain.

- (b) Please describe in percentage terms the range of fluctuation above and below the average for subparts (i), (ii) and (iii) in part (a) of this interrogatory for several representative Processing and Distribution Centers.

- (c) Please confirm that workshared First-Class mail volume fluctuates by the
- (i) day of the week,
 - (ii) week of the month, and
 - (iii) month of the year.

If you do not confirm, please explain.

- (d) Please describe in percentage terms the range of fluctuation above and below the average for subparts (i), (ii) and (iii) in part (c) of this interrogatory for several representative Processing and Distribution Centers.

- (e) To the extent that fluctuations in volume result in shifts in the proportion of First-Class single-piece and workshared volume, please explain, for each time period identified in parts (a) and (c) of this interrogatory, how plant managers of

Processing and Distribution Centers plan for and accommodate such shifts in the proportion of single-piece and workshared volume.

- (f) Please confirm that there are operating manuals, handbooks, instructions and other written guidance to plant managers on how to plan for and accommodate shifts in the proportion of First-Class single-piece and workshared volume. If you do confirm, please identify such operating manuals, handbooks, instructions and other written guidance to plant managers and provide copies. If you do not confirm, please explain and provide copies of any documents advising plant managers on how to plan for and accommodate any periodic fluctuations in mail volumes.

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 section 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
March 17, 2000