

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

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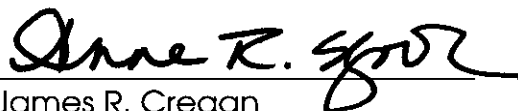
SECOND SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO UNITED STATES POSTAL SERVICE  
(MPA/USPS-2-13)

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(MARCH 17, 2000)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached institutional interrogatories to the United States Postal Service (MPA/USPS-2-13).

Respectfully submitted,



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**SECOND SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO UNITED STATES POSTAL SERVICE**

**MPA/USPS-2.** Please review the following chart derived from WS 7.0.4.1 of Witness Meehan's Workpapers in R2000-1, and Workpaper B-7 of Witness Alexandrovich's Workpapers in R97-1. The chart compares total city letter carrier time per actual stop (both in- and out-of office) for 1996 and 1998.

	Total Accrued Cost w/Relay per Actual Stop Base Year 1996	Route Type Stops as a Proportion of Total Stops Base Year 1996	Total Accrued Cost w/Relay/Actual Stops Base Year 1998	Route Type Stops as a Proportion of Total Stops Base Year 1998	Percentage Increase in Total Cost Per Actual Stop
Letter Route Type 71 Business Foot	\$2.48	0.5%	\$4.70	0.2%	89.5%
Letter Route Type 73 Business Motorized	\$2.02	0.5%	\$1.14	0.9%	(43.6%)
Letter Route Type 75 Residential Foot	\$0.68	9.4%	\$0.82	7.3%	20.6%
Letter Route Type 77 Residential Curbline	\$0.40	24.4%	\$0.27	36.1%	(32.5%)
Letter Route Type 78 Residential Park & Loop	\$0.76	60.9%	\$0.83	54.6%	9.2%
Letter Route Type 80 Mixed Foot	\$3.90	0.3%	\$10.15	0.1%	160.3%
Letter Route Type 82 Mixed Curbline	\$3.53	0.4%	\$7.98	0.3%	126.1%
Letter Route Type 83 Mixed Park & Loop	\$1.48	3.6%	\$11.60	0.5%	683.8%
All Letter Routes	\$0.73	100%	\$0.72	100%	(1.4%)

- (a) Given that the average hourly rate for carriers has increased less than 5% between base years 1996 and 1998, please explain the large per stop increases for Route Types 71, 75, 78, 80, 83, and 82.
- (b) Please explain the large per stop cost decrease for Route Type 77.
- (c) Please confirm the accuracy of the data presented in the table. If you cannot, please provide corrections and calculations.
- (d) Please confirm that the actual stops data presented in the two sets of workpapers represent the USPS's best estimate of total annual actual stops on letter routes in the system for those two years. If this is incorrect, please explain what the data do represent.
- (e) Please confirm that the proportion of "mixed" routes is declining and explain, from a route restructuring basis, why that is occurring.

**MPA/USPS-3.** Please review the following chart derived from WS 7.0.4.1 of Witness Meehan's Workpapers in R2000-1 and Workpaper B-7 of Witness Alexandrovich's Workpapers in R97-1.

	Proportions of SDR-MDR-B&M Stops Base Year 1996	Proportions of SDR-MDR-B&M Stops Base Year 1998
Route Type 71 Business Foot	10% - 2% - 87%	6% - 2% - 92%
Route Type 73 Business Motorized	36% - 3% - 61%	20% - 3% - 78%
Route Type 75 Residential Foot	76% - 16% - 7%	70% - 18% - 12%
Route Type 78 Residential Park & Loop	86% - 7% - 7%	86% - 7% - 7%
Route Type 77 Residential Curbline	92% - 4% - 4%	86% - 7% - 7%
Route Type 80 Mixed Foot	31% - 25% - 45%	67% - 10% - 24%
Route Type 83 Mixed Park & Loop	55% - 5% - 40%	72% - 7% - 21%
Route Type 82 Mixed Curbline	67% - 3% - 30%	74% - 4% - 22%
All Letter Routes	85% - 7% - 8%	84% - 8% - 8%

- (a) Please confirm the figures in the chart, or provide corrections.
- (b) Given the criterion of routes with 70% or more residential stops being categorized as residential routes, why are the routes included in Route Types 80, 83, and 82 considered "mixed" rather than "residential"?
- (c) It appears that Business and Mixed (B&M) stops from mixed routes are being shifted to business routes. Is this correct? If not, please explain the change in stop-type proportions between business and mixed routes.
- (d) In total, it appears that the proportions of stops by stop type have not changed significantly over the past two years. Is this correct?

**MPA/USPS-4.** Please provide any documentation or information available, including any documentation or information from the delivery redesign project, on the following:

- (a) Proportion of parcels delivered by city letter carriers that cause a non-routine delivery, i.e., the carrier must deliver the mail to a location other than the routine delivery point location.
- (b) Proportion of parcel deliveries where more than one parcel is delivered to an address.

- (c) Proportion of parcels delivered by city letter carriers that require the carrier to either interact in some way with the recipient or leave a written notice.
- (d) Guidelines on the type of parcels which -- or circumstances where -- the city letter carriers are required to physically hand to a customer rather than deliver to the normal mail receptacle.
- (e) Proportion of accountables delivered by city letter carriers that cause a non-routine delivery, i.e., the carrier must deliver the mail to a location other than the routine delivery point location.
- (f) Proportion of accountables on city letter routes where the carrier simply leaves a notice in the mail receptacle rather than delivers the accountable.
- (g) Circumstances under which the carrier does not have to conduct a transaction with a customer but rather can deliver it to the normal mail receptacle.

**MPA/USPS-5.** For all city delivery carrier letter routes for 1996 and 1998, please provide an estimate, and all available documentation, of:

- (a) The proportion of letters which were DPS.
- (b) The proportion of letters which were Sector Segment.
- (c) Any differences in (a) or (b) by route type.

**MPA/USPS-6.** For all city delivery carrier letter routes for 1988, 1996 and 1998, please provide an estimate, and all available documentation, on:

- (a) The proportion of multiple delivery, central, dismount, or VIM room stops/deliveries which received no carrier in-office casing.
- (b) The amount of volume for such stops/deliveries.
- (c) The extent to which that volume has to be cased at the delivery point by a city carrier or is simply dropped off for another individual to distribute.
- (d) Whether the City Carrier Cost System (CCS) collects data on the types of stops and volumes in (a) and (b) above.

**MPA/USPS-7.** Please explain the following, using current USPS definitions and distinctions for city letter routes:

- (a) Are Central or NDCBU mail receptacles ever served through a curblineline delivery?
- (b) When the carrier uses a vehicle to at least partially access a stop, what are the differences among NDCBU, central, multiple-delivery "other," and dismount deliveries?
- (c) When the carrier is on foot during the entire access to a stop, what are the differences among NDCBU, central, and multiple-delivery "other" deliveries?

**MPA/USPS-8.** For city delivery carriers with assigned letter routes, please provide for 1988, 1996, and 1998:

- (a) Their total Cost Segment 6 and 7 cost.
- (b) The proportions of time spent in-office and out-of-office.

**MPA/USPS-9.** For auxiliary assistance, please provide the following:

- (a) A definition of the term "auxiliary assistance."
- (b) An explanation of the circumstances under which auxiliary assistance incurs out-of-office time.
- (c) An explanation of the circumstances under which auxiliary assistance incurs in-office time.
- (d) For the years 1988, 1996, and 1998, the total amount of city letter route carrier in-office and out-of-office time spent on auxiliary assistance.

**MPA/USPS-10.** For routers, please provide the following:

- (a) A definition of the term "router."
- (b) An explanation of the circumstances under which a router is required for assistance to a city letter route carrier.

- (c) For the years 1988,1996, and 1998, the total amount of router time spent assisting city letter route carriers.

**MPA/USPS-11.** Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and explain the following:

- (a) The purpose of the form,
- (b) How the form is used.
- (c) When and how often the form is used.
- (d) How often the form is revised.
- (e) Who fills out the form.

**MPA/USPS-12.** Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and define and distinguish among the following terms and explain fully how each is measured:

- (a) Reference volume
- (b) Total cased volume
- (c) Total delivered volume

**MPA/USPS-13.** Please refer to USPS Form 3999 shown in Appendix E of USPS-T-13 and define and explain fully the following terms:

- (a) Allied Time
- (b) Net Delivery Time
- (c) PD's as Counted
- (d) Deliveries Made
- (e) PD's on 1621c
- (f) Allied Function Delivery Method
- (g) Secondary Desg-Unit
- (h) Res 1 2 3 4

- (i) Bus 5 6 7 8
- (j) Det Box
- (k) ZIP+4 High
- (l) ZIP+4 Firm

**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.

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Anne R. Noble

Washington, D.C.  
March 17, 2000