

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 MICHAEL W. MILLER (OCA/USPS-T24-5-6)
March 23, 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-T24-5. Please refer to your testimony at page 20, lines 23-30. You describe how a mail piece with a nonstandard aspect ratio might not be culled by an AFCS. (Please consult witness Kingsley if necessary.)

- (a) When you refer to a piece that may end up on its side rather than its long edge, are you referring to “square” pieces—i.e., pieces with an aspect ratio less than 1.3? If not, please explain why a piece with an aspect ratio greater than 2.5 would be likely to end up on its side.
- (b) Please confirm that perfectly square pieces (aspect ratio of 1.0) should be properly faced 50 percent of the time simply by chance. If you do not confirm, please explain.
- (c) Please confirm that pieces with an aspect ratio between 1.0 and 1.3 should be properly faced more than 50 percent of the time—i.e., such pieces have less propensity to “tumble” than perfectly square pieces and therefore are more likely to be properly faced. If you do not confirm, please explain.
- (d) Please describe the specific operations and pieces of equipment where a piece with an aspect ratio of less than 1.3 would be likely to “tumble.”
- (e) Please provide an estimate of the proportion of pieces with an aspect ratio less than 1.3 that are properly faced and canceled by AFCSes.
- (f) Please provide an estimate of the proportion of pieces that are nonstandard solely because of an aspect ratio less than 1.3.

OCA/USPS-T24-6. Please refer to Attachment USPS-T-24B. (Please consult witnesses Kingsley or Pafford if necessary.)

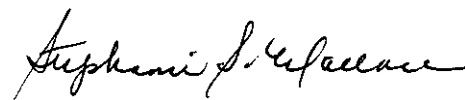
- (a) Please describe precisely how the nonstandard volumes by shape of First Class single piece mail are estimated.
- (b) Is a First Class piece that is nonstandard solely because its aspect ratio is less than 1.3 just as likely to be counted as other nonstandard pieces? Please explain how equal likelihood is ensured.
- (c) Are nonstandard First Class pieces identified by RPW solely on the basis of the postage they pay? By measurement? How are they identified?
- (d) Do the proportions of nonstandard First Class pieces by shape found in AFCS reject bins match the RPW proportions of nonstandard pieces by shape? Please explain the basis for your response.
- (e) Please explain how the estimates of under and over payment of postage provided in response to interrogatory OCA/USPS-69 are made.
- (f) Please provide a version of your Appendix I, pages 34-35, that reflects the actual proportions of and downflow densities for nonstandard (i) First Class letter-shaped pieces that enter automation mail flows from the AFCS and (ii) First Class letter-shaped pieces with an aspect ratio less than 1.3 that enter automation mail flows from the AFCS. If you cannot provide a complete response to this request, please provide all input data you can and state whether the estimates of nonstandard letter-shaped First Class unit cost would increase or decrease if full data were available.
- (g) Please explain why the cost difference between CRA SP flats and letters is a reasonable proxy for the additional costs of nonstandard First Class flats and

parcels. Please provide a version of Part B of Attachment USPS-T-24B that uses the unit costs from LR-I-91.

- (h) Please provide a version of Part B of Attachment USPS-T-24B that uses the unit costs from LR-I-91 and reflects the actual proportions of and downflow densities for pieces that enter automation or mechanization. If you cannot provide a complete response to this request, please provide all input data you can and state whether the estimate of nonstandard First Class unit cost would increase or decrease if full data were available.

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 S. Wallace

Washington, D.C. 20268-0001
March 23, 2000