

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

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS CAMPBELL
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T29-10 THROUGH 12)

The United States Postal Service hereby provides the responses of witness Campbell to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T29-10 through 12, filed on March 13, 2000.

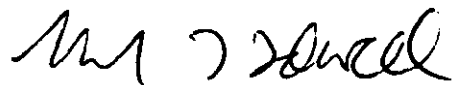
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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March 27, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS CAMPBELL TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T29-10.

Please refer to USPS-LR-I-160, Section C, page 1 and your workpaper IV.

- (a) Does the term "separation" refer to caller number as you use the term in workpaper IV? If not, please explain this term.
- (b) How many pieces of mail are represented by the 2,460 callers and the 5,995 separations?
- (c) Do any classes other than First-Class use caller service? Please explain fully.
- (d) Please provide the total volume of caller service mail for BY 1998 through the test year after rates.

RESPONSE:

- (a) Yes. The term "separation" refers to "caller number" in Campbell Workpaper IV.
- (b) I do not know the answer to this question because I did not collect this data.
- (c) Caller Service does not have any class restrictions. A Caller Service customer may receive any class of mail that he or she would receive in a Post Office box or mailbox.
- (d) The Postal Service does not collect caller service mail volumes.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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OCA/USPS-T29-11.

Please refer to your response to interrogatory OCA/USPS-T29-9, Scenario 1. If a QBRM piece were routed to an OCR,

- (a) what are the possible depths of sort that piece might receive?
- (b) would that piece *always* be routed from the OCR to an outgoing primary BCS?
- (c) would that piece *always* receive "one extra processing step"?
- (d) Please provide down flow densities for such a piece.
- (e) What proportion of QBRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?
- (f) What proportion of QBRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (g) What proportion of BRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?
- (h) What proportion of BRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (i) What proportion of CRM pieces are "not isolated during the outgoing facing and cancellation operation" for any reason?
- (j) What proportion of CRM pieces that are "not isolated during the outgoing facing and cancellation operation" have a FIM obscured by a stamp?
- (k) If you are unable to find data responsive to this interrogatory, please explain why the Postal Service does not collect the data.

RESPONSE:

- (a) A QBRM piece routed to an OCR could be sorted to a 3-digit ZIP code, a destinating plant, or a reject bin.

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Response to OCA/USPS-T29-11 (continued)

- (b) A QBRM piece routed to an OCR is not generally routed from the OCR to an outgoing primary BCS.
- (c) No. A QBRM piece routed to an OCR would not always receive one extra processing step.
- (d) Down flow densities for a QBRM piece routed to an OCR are not available.
- (e) I do not know the answer to this question.
- (f) I do not know the answer to this question.
- (g) I do not know the answer to this question.
- (h) I do not know the answer to this question.
- (i) I do not know the answer to this question.
- (j) I do not know the answer to this question.
- (k) The Postal Service does not collect the data because we have not encountered a need for it.

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OCA/USPS-T29-12.

Please refer to your response to interrogatory OCA/USPS-T29-9, Scenario 2. Please describe in more detail the procedures associated with providing a credit or refund. In particular,

- (a) Must a recipient of BRM request a credit or refund in order to receive one?
- (b) May recipients of BRM place a standing order for a credit or refund?
- (c) What proportion of BRM deliveries involves a credit or refund?
- (d) What proportion of QBRM deliveries involves a credit or refund?
- (e) In calculating a credit or refund, are the number of and amount of postage on BRM pieces counted individually? If not, please describe the calculation procedure.
- (f) Does the Postal Service charge a fee for calculating a credit or refund? If not, why not?

RESPONSE:

- (a) My understanding is that a BRM recipient must request a credit or refund in order to receive one.
- (b) My understanding is that a BRM recipient may not place a standing order for a credit or refund.
- (c) I do not know the answer to this question.
- (d) I do not know the answer to this question.
- (e) My understanding is that BRM pieces are individually counted (both number and amount of postage) when calculating a credit or refund.
- (f) Yes. My understanding is that the Postal Service charges a BRM recipient for the work hours needed to process the refund or credit.

DECLARATION

I, Chris F. Campbell, declare under penalty of perjury that the foregoing answers are true to the best of my knowledge, information and belief.


Chris F. Campbell

Dated: 3-27-00

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.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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