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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO POSTCOM INTERROGATORIES
(POSTCOM/USPS- 5(a,b), 6(c-g), 7(c-f) AND 8)

The United States Postal Service hereby provides its responses to the following interrogatories of PostCom: PostCom/USPS-5(a,b) 6(c-g), 7(c-f) and 8, filed on March 23, 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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April 11, 2000

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PostCom INTERROGATORIES**

PostCom/USPS-5. Please refer to the first paragraph of Page 1 of the USPS Address Deficiency Study (LR-I-192), which states, "The Address Deficiency Study was conducted as part of the broader USPS Undeliverable as Addressed (UAA) mail cost study...This effort updated the 1993 Operation Mail study used to identify the magnitude of issues related to address hygiene and to recommend and implement means of improving address accuracy."

- (a) Please file as library references copies of all reports of studies that were conducted as part of the broader USPS Undeliverable as Addressed (UAA) mail cost study.
- (b) Please file as a library reference a copy of the report of the 1993 Operation Mail study.
- (c) Please list all data sets that were collected as part of the USPS Undeliverable as Addressed (UAA) mail cost study.
 - (i) For each data set, please describe the contents of the data set.
 - (ii) For each data set, please provide a complete data dictionary.
 - (iii) For each data set, please indicate the data format.
 - (iv) Please provide an electronic copy of each data set.

RESPONSE:

- (a) See USPS LR I-82, which is the broader UAA Study.
- (b) Efforts to locate a copy of this study have proven unsuccessful. If a copy can be located, it will be filed as a Library Reference.
- (c)(i-iv) [Responses forthcoming]

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PostCom/USPS-6. Please refer to Figure 1 on Page 7 of LR-I-192.

- (a) Please complete a table equivalent to Figure 1 using only data for Standard (A) prebarcoded letters.
- (b) Please complete a table equivalent to Figure 1 using only data for Standard (A) letters that are not prebarcoded.
- (c) If data are available, please complete a table equivalent to Figure 1 using only data for Standard (A) prebarcoded non-letters.
- (d) If data are available, please complete a table equivalent to Figure 1 using only data for Standard (A) non-letters that are not prebarcoded.
- (e) If data are available, please complete a table equivalent to Figure 1 using only data for prebarcoded Periodicals mail.
- (f) If data are available, please complete a table equivalent to Figure 1 using only data for Periodicals mail that is not prebarcoded.
- (g) Individually for each deficiency type listed in Figure 1, please describe the additional USPS activities that are required due to the presence of the deficiency.

RESPONSE:

- (a) [Objection filed.]
- (b) [Objection filed.]
- (c-f) No such data are available.
- (g) Most pieces with these deficiencies are deliverable, despite the deficiency. The extra activities that would have to be performed would depend on site specific operations and practices and carrier route knowledge. An additional survey would need to be conducted to determine these activities.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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PostCom/USPS-7

Please refer to the table in Appendix C on Page 15 of LR-I-192.

- (a) Please complete a table equivalent to Appendix C using only data for Standard (A) prebarcoded letters.
- (b) Please complete a table equivalent to Appendix C using only data for Standard (A) letters that are not prebarcoded.
- (c) If data are available, please complete a table equivalent to Appendix C using only data for Standard (A) prebarcoded non-letters.
- (d) If data are available, please complete a table equivalent to Appendix C using only data for Standard (A) non-letters that are not prebarcoded.
- (e) If data are available, please complete a table equivalent to Appendix C using only data for prebarcoded Periodicals mail.
- (f) If data are available, please complete a table equivalent to Appendix C using only data for Periodicals mail that is not prebarcoded.

RESPONSE:

- (a) [Objection filed.]
- (b) [Objection filed.]
- (c-f) No such data are available.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PostCom INTERROGATORIES

PostCom/USPS-8

Please refer to Page 2 of LR-I-192, where it states, "As the Postal Service continues to expand its use of automated mail processing equipment, there are considerable cost savings due to the reduction in human handling of mail. However, in cases where automated equipment cannot process a mail piece due to significant address deficiencies, the full potential of cost savings due to automation cannot be realized. Because manual handling of mail is much more costly than automated processing, it is important to limit the extent of addressing deficiencies. Doing so may reduce overall mail processing costs significantly."

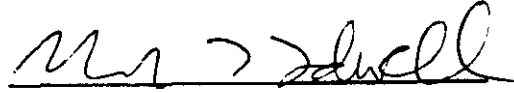
- (a) Please estimate the additional cost to the Postal Service caused by address deficiencies. Please describe the methods you used to develop the estimate and provide all underlying calculations in an electronic spreadsheet format.
- (b) Please disaggregate the cost provided in part (a) of this interrogatory by class, subclass, shape, and rate category. If the total cost cannot be disaggregated to this level of detail, please disaggregate the total cost to the extent possible.

RESPONSE:

- (a-b) The Postal Service has not collected data which would permit the development of an estimate of such costs.

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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