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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO CARLSON INTERROGATORIES DFC/USPS-72 - 77  
(September 6, 2001)

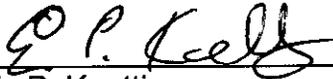
DFC/USPS-72 - 77 were filed on August 23, 2001. Responses are hereby provided. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

  
Eric P. Koetting  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992/ FAX: -5402  
September 6, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-72.** Please refer to USPS-LR-C2001-1/6 and the response to DFC/USPS-50. Please provide the documents and other instructions sent to field offices to request the information that the Postal Service compiled and filed as USPS-LR-C2001-1/6.

**RESPONSE:**

See attached sheets.

Author: [REDACTED] at [REDACTED]

Date: 8/3/2001 1:37 PM

Normal

Receipt Requested

TO: [REDACTED] at [REDACTED], [REDACTED], [REDACTED], [REDACTED]

ERIC P KOETTING [REDACTED], [REDACTED] at [REDACTED]

Subject: Holiday AMP Information for the Postal Rate Commission

----- Message Contents

Info-

Here is a sample of the messages I just sent to each of the MOSs to get the AMP data for the compelled response to the Carlson interrogatory.

[REDACTED]

Forward Header

Subject: Holiday AMP Information for the Postal Rate Commission

Author: [REDACTED] at [REDACTED]

Date: 8/3/01 1:22 PM

The Postal Rate Commission (PRC) has ruled that the Postal Service must provide information on holiday cancellations as part of docket C2001-1. Previously, we provided information from MCRS concerning plants that did not cancel mail on each holiday during the last two years. Now we need to tell the PRC what plant, if any, canceled mail for each plant that did not cancel its own mail on the various holidays.

The attached memo from Mr. Rapp requests each Area to provide the needed information by August 14. To facilitate this process, we prepared the attached spreadsheet for your Area. Please complete it and return it to me by cc mail. We will combine and format the spreadsheets from each Area for submission to the PRC.

Thank you,

[REDACTED]

[REDACTED]



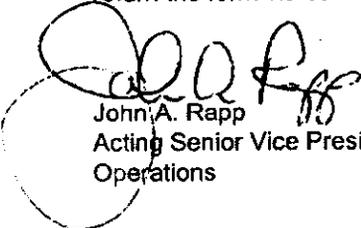
August 3, 2001

MANAGERS, OPERATIONS SUPPORT (AREA)

SUBJECT: Holiday AMP Information for the Postal Rate Commission

As part of a complaint case currently before the Postal Rate Commission, we are required to provide information concerning the facilities that did not cancel mail on various holidays during the last two years. Specifically, we need to show what plant, if any, cancelled mail for them.

You will be receiving a spreadsheet via cc:Mail to provide this information. Please complete and return the form via cc:Mail to [REDACTED] no later than August 14.



John A. Rapp  
Acting Senior Vice President  
Operations

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-73.** USPS-LR-C2001-1/2 and USPS-LR-C2001-1/6 contain apparent discrepancies for Veterans Day in 2000 for North Bay CA 949 GMF and San Francisco CA 941 GMF. Please explain whether these facilities processed outgoing First-Class mail on Veterans Day in 2000. If you can explain the reason for the discrepancy, please provide an explanation.

**RESPONSE:**

Neither facility cancelled on Veteran's Day 2000. Please see the response to DFC/USPS-76.

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**DFC/USPS-74.** Please discuss the extent to which the process of producing USPS-LR-C2001-1/6 revealed instances where the MCRS data indicated that a facility processed outgoing mail on a particular holiday even though the facility did not, in fact, process outgoing mail on that holiday. (One apparent example would be San Francisco CA 941 GMF on Veterans Day in 2000.)

**RESPONSE:**

Since the process of producing LR-6 was a disaggregated one, in the sense that field units performed their own updates of the spreadsheets, it is difficult to respond in terms of what was revealed in the course of that process. On the other hand, the color coding in the spreadsheets should provide some insights. If the entry "None" appears in black rather than red, it presumably is in a cell in which initially appeared the black notation "PR." If the MCRS data in LR-2 indicated from the beginning that the facility did not process, the cell would have been blank in the spreadsheet distributed to the field, and any subsequent entry of the word "None" should have appeared in red in such cells. Therefore, "None" should appear in black only in those cells which initially reflected, in accordance with the MCRS data in LR-2, that mail had been cancelled, and the change to "None" during the preparation of LR-6 would logically appear to be as a result of the type of scenario described in this question.

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**DFC/USPS-75.** Please refer to USPS-LR-C2001-1/6.

- a. Please explain why Pasadena CA 910 sent its outgoing First-Class Mail to "914" on Veterans Day in 2000, but Santa Clarita CA 914 did not process outgoing First-Class Mail on Veterans Day in 2000.
- b. Please explain why Tallahassee FL 323 sent its outgoing First-Class Mail to "322" on Independence Day in 2000, but Jacksonville FL 322 did not process outgoing First-Class Mail on Independence Day in 2000.

**RESPONSE:**

a. The Pacific Area indicates that Pasadena neither processed mail on that date, nor forwarded their mail to Santa Clarita on that date, and therefore the "914" in LR-6 reported for Pasadena for Veteran's Day 2000 was erroneous.

b. The Southeast Area indicates that the "322" entry for Tallahassee for that date was erroneously reported. The entry should have been "None."

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**DFC/USPS-76.** Please explain why four facilities in the Pacific Area apparently processed outgoing First-Class Mail on Veterans Day in 2000 even though Pacific Area policy, as reflected in USPS-LR-C2001-1/3, directed facilities not to process outgoing First-Class Mail on this holiday. Please provide relevant documents.

**RESPONSE:**

After consulting with its facilities, the Pacific Area reports that, as best can be determined, only one facility in the area might have cancelled mail on Veteran's Day, 2000.

San Francisco 941. In LR-2, the MCRS data indicated that San Francisco had cancelled on that date. In LR-6, the report was changed to show no cancellations. San Francisco indicates that the information in LR-6 is correct. Apparently, the MCRS data included in LR-2 reflected the cancellation activity conducted not on Saturday, November 11, but on Friday, November 10. End of Run reports confirm that the MCRS cancellation volume reflected in LR-2 match the actual level of activity on Friday, and that there were no cancellations on the Saturday holiday.

North Bay 949. In LR-2, the MCRS data indicated that North Bay had no cancellation volume on Veteran's Day, 2000. In LR-6, the report was changed to show that mail was processed. The latest information is that LR-2 was correct, and that North Bay did not process mail on the holiday; or send mail to another facility.

Oxnard 930. In LR-2, the MCRS data indicated that Oxnard processed a very small amount of volume. The information in LR-6 remained consistent with that report. The latest information, however, is that the activity reflected in the MCRS report for that day was limited to maintenance runs, which should have been reported in the

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next processing day's volume, and should not have been shown up on the holiday. In practical terms, the facility did not cancel mail on the holiday.

ML Sellers 921. In LR-2, the MCRS data indicated that ML Sellers did not process on Veteran's Day, 2000. In LR-6, the report was changed to show that the facility did cancel on that day. The latest information is that LR-2 was correct, and that the facility did not process on the holiday.

Santa Clarita 914. In LR-2, the MCRS data indicated that Santa Clarita processed on Veteran's Day 2000. In LR-6, the report was changed to show that the facility did not process on that day. Closer analysis does not resolve the uncertainty. The LR-2 figure may actually reflect the volume for Friday, November 10, rather than the Saturday holiday, and that volume may have erroneously been credited to the wrong day on the End of Run Report. The end times for Friday and the start times for Saturday are out of normal bounds. Apparently there is no way at this time to determine what actually happened. The intent of facility management was to not cancel mail on Veteran's Day, but data exist which indicate that there might have been cancellations on that day, and those data cannot be disproved.

Pasadena 910. In LR-2, the MCRS data indicated that Pasadena did not process on the holiday. In LR-6, the report showed that mail on Veteran's Day was forwarded to 914, Santa Clarita. The latest information is that Pasadena neither processed nor forwarded its mail on Veteran's Day 2000.

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Redding 960. In LR-2, the MCRS data indicated that Redding did not process. In LR-6, the report was changed to show that the facility did process. The latest information is that Redding did not process on Veteran's Day 2000.

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**DFC/USPS-77.** Please provide the full name and location of the Great Lakes Area facility abbreviated as "CHICAGO MSH" (603).

**RESPONSE:**

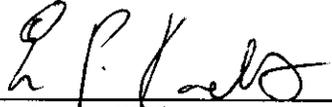
Chicago MSH is the Chicago Metro Surface Hub, 2591 Busse Road, Elk Grove Village IL 60007-6101.

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson  
P.O. Box 7868  
Santa Cruz CA 95061-7868

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Englewood NJ 07631-0528

  
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