

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-22-50)  
October 4, 2001

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Pursuant to Rules 25 through 28 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-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-22. For FY 2000 and FY 2001, please provide a copy of the advertising copy as well as a copy of each radio and TV script used to market (a) Priority Mail and (b) Express Mail.

OCA/USPS-23. Please explain the difference between a POS (point of sale) terminal and an IRT (integrated retail terminal).

OCA/USPS-24. For the following interrogatory, please assume that a postal patron arrives at a Postal Service window to ship a piece of Priority Mail.

- (a) What information is keyed into the clerk's terminal?
- (b) After the clerk keys in the information noted in part (a) of this interrogatory, please explain what information is subsequently provided on the "CRT" or monitor to the window clerk.
- (c) With regard to your responses to parts (a) and (b) of this interrogatory, please provide a printout of each screen display.

OCA/USPS-25. For the following interrogatory, please assume that a postal patron arrives at a Postal Service window to ship a piece of Express Mail.

- (a) What information is keyed into the clerk's terminal?
- (b) After the clerk keys in the information noted in part (a) of this interrogatory, please explain what information is subsequently provided on the "CRT" or monitor to the window clerk.
- (c) With regard to your responses to parts (a) and (b) of this interrogatory, please provide a printout of each screen display.

- (d) If a postal patron requests Express Mail service, does the computer program that operates the window clerk's terminal inform the clerk whether the Express Mail service can actually be achieved? (e.g., Express Mail sold after the final dispatch time or Express Mail destined for Post Offices that do not receive daily Express Mail delivery.)
- (e) Referring to your response to part (d), is the window clerk trained to inform the customer that the Express Mail delivery service standards cannot be met?
- (f) Please provide a copy of all training materials and other documents pertaining to Express Mail delivery standards and the inability to perform the service purchased.

OCA/USPS-26. The following excerpt is from the IRS Publication 17, entitled "Your Federal Income Tax," for 2000 returns. "Your paper return is filed on time if it is mailed in an envelope that is properly addressed and postmarked by the due date. The envelope must have enough postage. If you send your return by registered mail, the date of the registration is the postmark date. The registration is evidence that the return was delivered. If you send a return by Certified Mail and have your receipt postmarked by a postal employee, the date on the receipt is the postmark date. The postmarked Certified Mail receipt is evidence that the return was delivered."

- (a) Prior to the filing of this interrogatory, was the Postal Service aware of this IRS Publication 17 statement? If not, please explain why not.
- (b) Assume that a taxpayer posts a two-ounce tax return prior to the IRS's tax filing deadline. In order for a taxpayer to avoid penalties from the IRS for a late filing,

is it of any use for a taxpayer to mail the return via Priority or Express Mail?

Please explain fully.

OCA/USPS-27. Please provide a list of all Post Offices that do not receive daily deliveries of Express Mail (e.g., Hyder, AK).

OCA/USPS-28. For FY 2000 and FY 2001 and for each Post Office identified in OCA/USPS-27, please provide the average time it took to deliver a piece of Express Mail destined for these Post Offices. Please cite your sources and provide a copy of all documents referenced if one has not been previously filed in this docket.

OCA/USPS-29. For FY 2000 and FY 2001 and for each Post Office identified in OCA/USPS-27, please provide the following information. Include in your responses cites to your sources and provide a copy of all documents referenced if one has not been previously filed in this docket. If you are unable to provide an actual value, please provide an estimate.

- (a) By Express Mail service, please provide the volume and revenue generated from each Post Office.
- (b) The volume of Express Mail sent from each Post Office that was unable to meet the Express Mail delivery service standard.
- (c) Referring to part (b) of this interrogatory, please provide the subsequent number of Express Mail postage refund claims filed due to the failure of the Express Mail piece to meet its delivery service standard. Please include in your response the volume of claims paid and the total amount paid.
- (d) The volume of Express Mail pieces received by each Post Office.

- (e) The volume of Express Mail pieces received by each Post Office that was eligible for an Express Mail postage refund due to a service standard failure.
- (f) Referring to part (e) of this interrogatory, please provide the subsequent number of Express Mail postage refund claims filed due to the service standard failure. Please include in your response the total claims paid and the total amount paid.

OCA/USPS-30. For FY 2000 and FY 2001, please provide the following Express Mail Next Day Service data. Please cite your sources and provide a copy of the documents referenced if one has not been previously filed. If you are unable to provide an actual value, please provide an estimate.

- (a) The total volume and revenue generated by Saturday sales.
- (b) Of the Saturday Express Mail sales, please provide the total volume and revenue of mail for which the delivery service standard was not met (e.g., due to a remote location, a P.O. Box address where the post office lobby was closed, etc.).
- (c) Referring to part (b) of this interrogatory, please provide: (1) the total claims filed, (2) the total volume of claims paid, and (3) the total amount paid.

OCA/USPS-31. Please identify each Post Office that has a final mail dispatch time prior to the retail lobby closing.

- (a) Can a postal patron purchase Express Mail Next Day service after the final mail dispatch time?
- (b) Referring to part (a) of this interrogatory, what happens to a Next Day Express Mail piece that has been purchased after the final dispatch time?

- (c) For FY 2000 and FY 2001, please provide the total volume and revenue generated by Express Mail Next Day delivery sold after the final dispatch time. Please cite your source and provide a copy of the document referenced if one has not been previously filed in this docket.
- (d) Referring to part (c) of this interrogatory, please provide the total volume of mail that did not meet the Express Mail Next Day Delivery Standard. Please cite your source and provide a copy of the document referenced if one has not been previously filed in this docket.
- (e) Referring to part (d) of this interrogatory, please provide the total number of claims subsequently filed as well as the total volume and amount of postage refunds paid. Please cite your source and provide a copy of the document referenced if one has not been previously filed in this docket.

OCA/USPS-32. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 32, lines 12-14. Witness Kingsley states that

near scheme change time, volume may be lighter or intermittent as the last pieces come in from up stream operations. Skilled supervision can reduce, but rarely eliminate, the resulting loss of productivity.

- (a) Would “skilled supervision” utilize manual sortation for “lighter or intermittent” volumes in order to begin sorting of staged mail for the next scheme at an earlier time? If not, why not.
- (b) Does the time at which “lighter or intermittent” volumes begin to arrive at a given piece of equipment in a given plant vary by day of the week, month, or year? If so, why?

OCA/USPS-33. The following interrogatory refers to Express Mail.

- (a) For FY 2000 and FY 2001, please provide the following: (1) the total number of claims filed, (2) the number of claims paid, and (3) the total amount of postage refunds paid, because the Postal Service failed to meet the overnight delivery standard. Please cite your source and provide a copy of the document referenced if one has not been previously filed in this docket.
- (b) Please provide the ten most frequently reported reasons a claim was filed.
- (c) Please provide the ten most frequently recorded reasons a claim was paid.
- (d) Please provide the ten most frequently recorded reasons a claim was denied.

OCA/USPS-34. Please refer to Docket No. R2000-1, and the testimony of witness Daniel (USPS-T-28), Figures 1, 2 and 3. Please provide updated Figures 1, 2 and 3 based upon the testimony of witness Schenk and the library references supporting that testimony. Provide citations to all sources and show all calculations.

OCA/USPS-35. Please refer to the testimony of Michael Miller (USPS-T-22), and USPS LR-J-60, Part B, "Standard Mail Letters." There are ten cost model spreadsheets for letters: Standard Mail Nonauto Machinable Mixed Mix AADC/AADC Presort Letters; Standard Mail Nonauto Machinable 3-Digit/5-Digit Presort Letters; Standard Mail Nonauto Nonmachinable MADC Presort Letters; Standard Mail Nonauto Nonmachinable ADC Presort Letters; Standard Mail Nonauto Nonmachinable 3-Digit Presort Letters; Standard Mail Nonauto Nonmachinable 5-Digit Presort Letters; Standard Mail Auto Mixed Mix AADC Presort Letters; Standard Mail Auto AADC Presort Letters; Standard Mail Auto 3-Digit Presort Letters; and Standard Mail Auto 5-Digit

Presort Letters. Each cost model spreadsheet identifies the following operations: Entry Activities; Outgoing RBCS; Outgoing Primary; Outgoing Secondary; Incoming RBCS; Incoming MMP; Incoming SCF/Primary; 5-Digit Barcode Sort; and Incoming Secondaries.

- (a) Please identify each piece of mail processing equipment for each operation in the ten cost model spreadsheets.
- (b) For each piece of mail processing equipment identified in response to part (a), please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for Standard Mail letter-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for Standard Mail letter-shaped mail provided in response to part (b) are greater than the standards for Standard Mail letter-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the ten cost model spreadsheets represent different mailstreams for the processing of all letter-shaped Standard Mail. If you do not confirm, please explain and identify all mailstreams for the processing of letter-shaped Standard Mail.

OCA/USPS-36. Please refer to the testimony of Michael Miller (USPS-T-24), and USPS LR-J-61, Part C, "Standard Mail Flats." There are six cost model spreadsheets for flats: Basic Nonauto Presort; 3-/5-Digit Nonauto Presort; Basic Auto Presort; Basic Auto Presort (Presort Level Held Constant); 3-/5-Digit Auto Presort; and, 3-/5-Digit Auto



Presort (Presort Level Held Constant). Each cost model spreadsheet identifies the following operations: Outgoing primary (Package); Incoming MMP (Package); Incoming Primary (Package); Incoming Secondary (Package); Outgoing Primary (Piece); Outgoing Secondary (Piece); Incoming MMP (Piece); Incoming SCF (Piece); Incoming Primary (Piece); and, Incoming Secondary (Piece).

- (a) Please identify each piece of mail processing equipment for each operation in the six cost model spreadsheets.
- (b) For each piece of mail processing equipment identified in response to part (a), please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for Standard Mail flat-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for Standard Mail flat-shaped mail provided in response to part (b) are greater than the standards for Standard Mail flat-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the six cost model spreadsheets represent different mailstreams for the processing of all flat-shaped Standard Mail. If you do not confirm, please explain and identify all mailstreams for the processing of flat-shaped Standard Mail.

OCA/USPS-37. Please refer to USPS LR-J-60, Part A, "First-Class Mail Letters/Cards," and Part B, "Standard Mail Letters." Please explain why there are 17

cost models for First-Class Mail letters/cards, and only ten cost models for Standard Mail letters.

OCA/USPS-38. Please refer to USPS LR-J-61, Part A, "First-Class Mail Flats," and Part C, "Standard Mail Flats." Please explain why there are nine cost models for First-Class Mail flats, and only six cost models for Standard Mail flats.

OCA/USPS-39. For letter-shaped pieces, please provide first piece handlings (FPH) for each subclass in First-Class Mail and Standard Mail, by operation and by type of processing equipment.

OCA/USPS-40. For flat-shaped pieces, please provide first piece handlings (FPH) for each subclass in First-Class Mail and Standard Mail, by operation and by type of processing equipment.

OCA/USPS-41. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at page 23, lines 11-12, which states that the Linear Integrated Parcel Sorter (LIPS) machine "is not part of a national program and is procured locally."

- a. Please identify all processing equipment "not part of a national program" that is used in the processing of Standard Mail.
- b. For each piece of processing equipment identified in part (a) of this interrogatory, please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for 1) letters, 2) flats, and 3) nonletters/nonflats.

OCA/USPS-42. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at pages 3-9. For each type of processing equipment (identified by bullets on the referenced pages),

- a. Please confirm that prebarcoded First-Class letter-shaped pieces and prebarcoded Standard Mail letter-shaped pieces are processed on the equipment. If you do not confirm, please explain.
- b. If you confirm part a., please explain whether prebarcoded First-Class letter-shaped pieces and prebarcoded Standard Mail letter-shaped pieces are processed where such pieces are commingled (e.g., one prebarcoded First-Class letter-shaped piece, then one prebarcoded Standard Mail letter-shaped piece, then another prebarcoded First-Class letter-shaped piece, etc.), processed serially (e.g., 1,000 prebarcoded First-Class letter-shaped pieces, then 1,000 prebarcoded Standard Mail letter-shaped pieces, then 1,000 prebarcoded First-Class letter-shaped pieces, etc., for example), or processed separately (e.g., all prebarcoded First-Class letter-shaped pieces are processed, after which the equipment is reconfigured and/or stopped, and then all prebarcoded Standard Mail letter-shaped pieces are processed) on the equipment.
- c. Please confirm that all barcoded First-Class letter-shaped pieces and all barcoded Standard Mail letter-shaped pieces are processed on the equipment. If you do not confirm, please explain.
- d. If you confirm part c., please explain whether all barcoded First-Class letter-shaped pieces and all barcoded Standard Mail letter-shaped pieces are processed where such pieces are commingled (e.g., one barcoded First-Class

letter-shaped piece, then one barcoded Standard Mail letter-shaped piece, then another barcoded First-Class letter-shaped piece, etc.), processed serially (e.g., 1,000 barcoded First-Class letter-shaped pieces, then 1,000 barcoded Standard Mail letter-shaped pieces, then 1,000 barcoded First-Class letter-shaped pieces, etc., for example), or processed separately (e.g., all barcoded First-Class letter-shaped pieces are processed, after which the equipment is reconfigured and/or stopped, and then all barcoded Standard Mail letter-shaped pieces are processed) on the equipment.

OCA/USPS-43. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at pages 13-16. For each type of processing equipment (identified by bullets on the referenced pages),

- a. Please confirm that prebarcoded First-Class flat-shaped pieces and prebarcoded Standard Mail flat-shaped pieces are processed on the equipment. If you do not confirm, please explain.
- b. If you confirm part a., please explain whether prebarcoded First-Class flat-shaped pieces and prebarcoded Standard Mail flat-shaped pieces are processed where such pieces are commingled (e.g., one prebarcoded First-Class flat-shaped piece, then one prebarcoded Standard Mail flat-shaped piece, then another prebarcoded First-Class flat-shaped piece, etc.), processed serially (e.g., 1,000 prebarcoded First-Class flat-shaped pieces, then 1,000 prebarcoded Standard Mail flat-shaped pieces, then 1,000 prebarcoded First-Class flat-shaped pieces, etc., for example), or processed separately (e.g., all prebarcoded First-Class flat-shaped pieces are processed, after which the equipment is

reconfigured and/or stopped, and then all prebarcoded Standard Mail flat-shaped pieces are processed) on the equipment.

- c. Please confirm that all barcoded First-Class flat-shaped pieces and all barcoded Standard Mail flat-shaped pieces are processed on the equipment. If you do not confirm, please explain.
- d. If you confirm part c., please explain whether all barcoded First-Class flat-shaped pieces and all barcoded Standard Mail flat-shaped pieces are processed where such pieces are commingled (e.g., one barcoded First-Class flat-shaped piece, then one barcoded Standard Mail flat-shaped piece, then another barcoded First-Class flat-shaped piece, etc.), processed serially (e.g., 1,000 barcoded First-Class flat-shaped pieces, then 1,000 barcoded Standard Mail flat-shaped pieces, then 1,000 barcoded First-Class flat-shaped pieces, etc., for example), or processed separately (e.g., all barcoded First-Class flat-shaped pieces are processed, after which the equipment is reconfigured and/or stopped, and then all barcoded Standard Mail flat-shaped pieces are processed) on the equipment.

OCA/USPS-44. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at pages 3-9. For each type of processing equipment (identified by bullets on the referenced pages),

- a. Please provide the throughputs and transport velocities for letter-shaped pieces for the following weights: <1 oz., 1 oz. < 2 oz., 2 oz. < 3 oz., and 3 oz. < 4 oz.
- b. Please confirm that the throughputs and velocities provided in response to part a. are the same for barcoded First-Class letter-shaped pieces and barcoded

Standard Mail letter-shaped pieces of a given weight. If you do not confirm, please explain.

OCA/USPS-45. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at pages 13-16. For each type of processing equipment (identified by bullets on the referenced pages),

- a. Please provide the throughputs and transport velocities for flat-shaped pieces for the following weights: <1 oz., 1 oz. < 2 oz., 2 oz. < 3 oz., and 3 oz. < 4 oz., 4 oz. < 5 oz., 5 oz. < 6 oz., 6 oz. < 7 oz., 7 oz. < 8 oz., 8 oz. < 9 oz., 9 oz. < 10 oz., 10 oz. < 11 oz., 11 oz. < 12 oz., 12 oz. < 13 oz., 13 oz. < 14 oz., 14 oz. < 15 oz., and, 15 oz. < 16 oz.
- b. Please confirm that the throughputs and velocities provided in response to part a. are the same for First-Class flat-shaped pieces and Standard Mail flat-shaped pieces of a given weight. If you do not confirm, please explain.

OCA/USPS-46. Please refer to USPS-LR-J-58, File LR58ASP.xls, Sheet "SP all (detail)," cell "W6," which contains the figure 17.5164548838487.

- (a) Please confirm that the figure 17.5164548838487 represents the density of total First-Class Mail. If you do not confirm, please explain.
- (b) Please explain the rationale for calculating the figure 17.5164548838487.
- (c) Please confirm that the figure 17.5164548838487 is not used in any calculations. If you do not confirm, please explain.

OCA/USPS-47. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 30, lines 11-13. Witness Kingsley states:

The time required to change sort schemes each day within a plant is largely fixed and does not change in proportion to changes in volume.

- (a) What is the basis for this statement?
- (b) Does the set of sort schemes used by a particular plant vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.
- (c) Does the number of sort schemes used by a particular plant vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.
- (d) Does the set of sort schemes used by a particular plant for outgoing distribution vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.
- (e) Does the number of sort schemes used by a particular plant for outgoing distribution vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.
- (f) Please explain why the set or number of sort schemes used would vary from day to day within a given plant, holding the network of other plants constant.
- (g) For a given plant and a given outgoing sort scheme, does the stacker receiving the maximum volume vary from day to day? Please explain why this could happen.

OCA/USPS-48. Please refer to the table at page 31 of the testimony of Linda A. Kingsley (USPS-T-39).

- (a) Please provide the raw data underlying this table.

- (b) Please list all forms, reports, data bases, or other sources that could be used to isolate scheme change time from run time for each scheme utilized.
- (c). For each facility that provided data for the table, state the dates on which data were collected.
- (d) Were all data collected provided to witness Kingsley? Please provide all data collected.
- (e) Were all data collected utilized by witness Kingsley? Please provide any data that were not utilized by witness Kingsley.
- (f) For the “two local plants” that provided data, for the most recent Accounting Period available, please provide a tabulation of volume processed by day by sort scheme by stacker number. If similar data are available for other plants, please provide them.
- (g) For the “two local plants” that provided data, for the most recent Accounting Period available, please identify (by job title) the person(s) responsible for creating or modifying sort schemes. Please describe the training received by such persons with respect to creating or modifying sort schemes. Please provide copies of all instructional or other materials relating to sort schemes available to or utilized by such persons.

#### OCA/USPS-49.

- (a) For a particular operation (e.g., outgoing primary), does the proportion of manual first piece handlings (FPH) in a particular plant vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.



- (b) For a particular operation (e.g., outgoing primary), does the proportion of manual total piece handlings (TPH) in a particular plant vary by day of the week, day of the month, or day of the year? If your response is negative, please provide documentary corroboration.
- (c) Please explain why these proportions would vary from day to day within a given plant, holding the network of other plants constant.

OCA/USPS-50. Please refer to DMM sections E500.5.4 and E500.5.5. Confirm that the Postal Service provides Express Mail Next Day Service for designated destination facilities 365 days per year (366 days in leap years) including all Sundays and all federal holidays.

- (a) If you are unable to confirm, please explain.
- (b) How does the Postal Service determine when a “designated delivery area of [a] destination facility” can effect delivery of an Express Mail piece by noon or 3 p.m. of the next day? Please explain in full. Set forth all criteria by which the determination is made.
- (c) How does the Postal Service determine when it should *not* designate a delivery area or facility as one that can effect next day (noon or 3 p.m.) delivery? Please explain in full. Set forth all criteria by which the determination is made.

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 Rule 12 of the rules of practice.

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Stephanie Wallace

Washington, D.C. 20268-0001  
October 4, 2001