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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA//USPS-1-2(a,b) AND 4-21a)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-1-21, filed on September 28, 2001. OCA/USPS-2 (c,d) and 3 were redirected to USPS Witness Maura Robinson (USPS-T-29).

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

Michael Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 October 12, 2001

OCA/USPS-1 In First-Class Letters and Sealed Parcels, Regular, please confirm that there is substantial averaging of costs by shape (i.e., letter-shaped, flat-shaped, and nonletter/nonflat-shaped). If you do not confirm, please explain.

RESPONSE:

It can be confirmed that the costs for First-Class single-piece presort letters, flats, and sealed parcels are averaged and reported as First-Class Mail "single-piece letters" in the Cost and Revenue Analysis (CRA). It can also be confirmed that the costs for First-Class nonautomation presort letters, flats and sealed parcels are averaged and reported as part of First-Class Mail "presort letters" in the CRA. See USPS LR-J-2.

The use of the term "substantial" is questionable, however, as the vast majority (nearly 90%) of these mail pieces are letter-shaped. See USPS LR-J-112 Table 11.

OCA/USPS-2

- (a) Please confirm that shape (i.e., letter-shaped, flat-shaped, and nonletter/nonflat-shaped) is a cost-driving factor in First-Class Letters and Sealed Parcels, Automation-Presort. If you do not confirm, please explain.
- (b) Please confirm that shape is a cost-driving factor in First-Class Letters and Sealed Parcels, Regular. If you do not confirm, please explain.
- (c) Please confirm that shape should be recognized in the rate structure of First-Class Letters and Sealed Parcels, Regular. If you do not confirm, please explain.
- (d) Please confirm that a more complex rate design (different rates for each weight/shape cell) for pieces weighing over one ounce would more closely align costs with rates. If you do not confirm, please explain.

RESPONSE:

- (a) It can be confirmed that shape is a cost driver for First-Class Mail single-piece and nonautomation presort letters, flats, and sealed parcels mail processing (USPS LR-J-53) and delivery unit costs (USPS LR-J-117).
- (b) It can be confirmed that shape is a cost driver for First-Class Mail automation presort letters, flats, and sealed parcels mail processing (USPS LR-J-53) and delivery unit costs (USPS LR-J-117).
- (c) Redirected to witness Robinson for response.
- (d) Redirected to witness Robinson for response.

In the First-Class Letters and Sealed Parcels subclass,

- (a) Please confirm that as the weight of mail increases, the proportion of letter-shaped pieces decreases and the proportion of flat-shaped and nonletter/nonflat shaped pieces increases. If you do not confirm, please explain.
- (b) Please confirm that flat-shaped pieces are more costly to process and handle than letter-shaped pieces, and nonletter/nonflat-shaped pieces are more costly to process and handle than flat-shaped pieces. If you do not confirm, please explain.

RESPONSE:

- (a) In general, this can be confirmed. See USPS LR-J-112 Table 11.
- (b) Confirmed. This response assumes this question refers to the "processing and handling" costs associated with mail processing tasks. See USPS-T-15, Attachment 15, page 1.

OCA/USPS-5 For First-Class 1) letters, 2) flats, and 3) nonletters/nonflats, please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for any processing equipment to be deployed by the Postal Service through the test year.

RESPONSE:

Mail processing equipment manufacturers must design their equipment around the standards contained in the Domestic Mail Manual (DMM). Once this equipment is purchased and deployed, tests are not typically conducted to evaluate the extent to which specific pieces of equipment may be able to handle variations in DMM standards. If attempts were made to process mail that exceeds DMM standards on equipment designed around those standards, the equipment could be damaged. In addition, DMM standards are necessary to ensure that mail can be processed through the entire network. Consequently, the ability of one or more pieces of equipment to accommodate a small amount of variation is irrelevant.

Length, Thickness, and Height: Mail processing equipment manufacturers must design their equipment around the standards contained in the Domestic Mail Manual (DMM) section C050 Exhibit 2.0 for machinable letters, flats, and parcels.

Weight: Mail processing equipment manufacturers must design their equipment around the weight standards contained in DMM sections C810.2.4, C820.2.4 and C050.4.0 for machinable letters, flats, and parcels, respectively.

Aspect Ratio: The aspect ratio requirement applies to letters only. Mail processing equipment manufacturers must design their equipment around the standard contained in DMM section C810.2.2.

OCA/USPS-6 Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 2, lines 4-5.

- (a) Please define the term mailstream.
- (b) Is shape the defining characteristic of Postal Service processing mailstreams? Please explain.
- (c) Please confirm that there are only three distinct processing mailstreams, e.g., letters, flats and parcels. If you do not confirm, please explain.
- (d) Is manual processing considered a separate mailstream? Is manual processing of letters, flats and parcels considered three separate mailstreams? Please explain.
- (e) Is the processing of bundles, sacks and trays considered three separate mailstreams? Please explain.
- (f) Is Priority Mail considered a separate mailstream? Please explain.

RESPONSE:

- (a) The term "mailstream" refers to a grouping of mail pieces based on specific mail piece characteristics. This term is typically used when referring to the processing steps required to sort and finalize the mail pieces within a given mailstream. The term is somewhat generic and can be used in many different contexts. For example, one could refer to the "letters mailstream" when referring to the processing steps required to sort and finalize all letters. One could also use this term in a more limited sense, such as the "First-Class single-piece letters mail stream."
- (b) On a macro level, yes. On a micro level, there are mailstreams within the larger shape mailstream. For example, within letter processing, operations typically manages and thinks in terms of an automated and a manual mailstream.
- (c) On a macro level, this can be confirmed, but not on a micro level. For example, parcels have various mailstreams depending on class and processing category (machinability). Within the larger overall parcel mailstream, there are

Package Services machinable, non-machinable, and irregular parcel mailstreams, which differ from separate flows for First Class and Priority parcels.

- (d) Again, it depends on the context in which the term "mailstream" is being used. In most instances, it can be confirmed that manual letters, flats, and parcels are considered to be as few as three mailstreams. However, one could refer to the First-Class manual letters mailstream versus the Standard Mail manual letters mailstream when discussing the processing steps required to sort and finalize mailpieces.
- (e) No. A "mailstream" typically refers to the mailpieces themselves, as defined by specific mailpiece characteristics. The operations required to process bundles, sacks, or trays would typically be subset of all mail processing operations required to sort and finalize the mail pieces in a given "mailstream," assuming the mail pieces within that mailstream were entered in bundles, sacks, or trays.
- (f) Yes, in the context of mail processing operations.

RESPONSE OF THE POSTAL SERVICE TO INTERRATORIES OF THE OFFICE OF CONSUMER ADVOCATE

OCAUSPS-7. The following interrogatory refers to a case study, "Pushing the Envelope, The U.S. Postal Service Digs Deep to Deliver What Customers Really Want," by Francia Smith, Lizbeth Dobbins, and Janet Tonner. A copy of the article is attached. The case study indicates that "Postal Service mangers have access to as many as 180,000 business-satisfaction surveys and 200,000 residential surveys every three months. And while customer satisfaction surveys have been around for a long time, what makes these different – and a great model for any service company – is that the results are linked by ZIP Code to precise locations and operations at the Postal Service."

- (a) Please provide copies of the 180,000 business-satisfaction surveys and 200,000 residential surveys that are performed every three months.
- (b) For each year and each three month period in FY 2000 and FY 2001, please provide by postal region, a copy of the survey results referred to in the case study.

RESPONSE:

- (a) Attached are a copy of the U.S. Postal Service Customer Satisfaction

 Survey (Attachment A) and a copy of the U.S. Postal Service Business

 Satisfaction Survey (Attachment B).
- (b) Objection and joint motion for protective conditions filed on October 9, 2001.

U.S. Postal Service Customer Satisfaction Survey

To be completed by an individual knowledgeable about the household's mail. Please base your answers only on your household's direct experience during the past 30 days — not on what you have heard from others, experienced in the workplace, learned from the news, or on experiences older than 30 days. Your answers to these questions will be kept confidential and will only be used to identify groups of similar respondents for statistical purposes.

Please follow the steps below carefully when completing this survey:

- Use a blue or black ink pen that does not soak through the paper.
- Make solid marks that fit in the response boxes. (Make no stray marks on the survey.)

RIGHT WAY ► X 98 WRONG WAY	▶ ₩	99	
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Mail You Receive

	Based on your experiences during the past 30 days, please rate the Postal delivery. (PLEASE MARK ONE ANSWER BY FUTTING AN "x" IN THE APPROPRIATE	Service on e	each of to	the follow	wing asp	ects of y	our mail
		Excellen	Very t Good	Good	Fair	Poor	Don't Know ▼
	a. Delivery of mail to the correct address						
	b. Delivery of mail in good condition						
	c. Delivery of mail about the same time each day	🗆					
	d. Carrier was professional and courteous						
	e. The security of your mail (that it will remain unopened and safe from theft and/or loss)						
ı	f. The security of mail in your mailbox						
ı	g. Overall quality of your mail delivery service						
1							
2	During the past 30 days, have you experienced the following situation with (IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE BOX X INDICATE.		ANY TIM	es.)	•	More	
2	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE BOX X INDICA			es.)	o your re 2-3 times		? Don't K <u>no</u> w
2	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE BOX X INDICA. In the past 30 days?	TING HOW M	Not at	es.)	2-3	More than 3	Don't
7.	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE BOX INDICA. In the past 30 days? a. Received mail intended for a different address	TING BOW M	Not at	es.)	2-3	More than 3	Don't
2	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed to a previous r	ring Bow M	Not at all	es.)	2-3	More than 3	Don't
7	In the past 30 days? a. Received mail intended for a different address	ring Bow M	Not at all	es.)	2-3	More than 3	Don't
2	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed to a previous r	esident	Not all	es.)	2-3	More than 3	Don't
71	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed to a previous r. Received damaged mail	esident	Not at all	es.)	2-3	More than 3 times	Don't
2	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed to a previous r. c. Received damaged mail	esident	Not at all	es.)	2-3	More than 3 times	Don't

In the past 30 days, what happened if no one was at home when your Postal carrier had a package to deliver to your	Where do you normally buy stamps? (MARK THOSE THAT APPLY.)
household? (MARK ONLY ONE.)	Post office counter
You got a notice of attempted delivery and	Grocery store or other store
you picked up your package at the post office	☐ Vending machine
you requested redelivery	From carrier (where available)
Carrier left the package	□ ATM
with someone (Examples: neighbor, rental office, etc.)	Order by Mail
in a locked box or locker for you (Examples: on porch, near mailbox, etc.)	Order by Telephone (1-800-STAMP24)
	·
Not applicable, no package received (Go to Q #5) Not applicable, someone was home (Go to Q #5)	Order by Internet (Stamps On Line)
[] Not applicable, someone was nome (60 to 2 "5)	How do you typically mail a package with the Postal
Thinking about your answer to question #3, please rate	Service? (MARK ONLY ONE.)
how well this delivery method met your needs.	Bring to post office counter
Very Don't Excellent Good Good Fair Poor Know	Use self-service equipment at post office
	(vending, scales)
	Leave for carrier
	Call Postal Service to pick up
Mail You Send	Other
Based on your experiences in the past 30 days, please rate	Not Applicable
the U.S. Postal Service on each of the following: Does Excel- Very not	1 Hot Applicable
lent Good Good Fair Poor apply	
a. Ease of buying stamps	Post Office
b. Ease of mailing letters	
c. Ease of mailing a	During the past 30 days, how many times did you visit a post office? (MARK ONLY ONE.)
package	l :
d. Easy to decide which	Not at all (Go to Question #12)
mailing options to use (Examples: Priority Mail,	1-2 times
insurance, registered	3-5 times
mail, etc.)	More than 5 times
e. Ease of deciding which mailing form to use	During your most recent visit to the post office
f. Ease of returning	Yes No Know
merchandise you ordered	a. Did the clerk greet you pleasantly?
g. Convenient location of	†
a post office	b. Did the clerk ask you questions to find out what you needed?
h. Convenient location of a mail collection box	c. Was the clerk able to clearly explain
i. Level of confidence that	the mailing services and products you
mail you send is received	needed?
j. The time it usually takes	d. Did the clerk suggest additional
for a letter you send to be delivered in your	mailing services or products?
local area	If "Yes," was the suggestion helpful?
k. The time it usually takes	e. Did the clerk thank you?
for a letter you send to be delivered in other	f. Were stamp vending machines in
parts of the country	working order?

16	During your most recent visit to the post office, how	14 In the past 30 days, has anyone in your household
I	long did you wait in line? (MARK ONLY ONE.)	completed a change-of-address card so that your mail would be forwarded to a different address, including a
1	No wait/No line	temporary or vacation address?
l	Less than I minute	→ Yes, for an individual
1	1 – 3 minutes	Yes, for the household
	4-5 minutes	
1	☐ 6 – 10 minutes ☐ More than 10 minutes	No (Go to Question #16)
١	Don't know/Can't recall	If "Yes," please provide the 5-digit ZIP
\perp		Code you forwarded your mail from
4		15 Please rate the Postal Service on:
1	please rate the post office you have visited most often on each of the following	Excel- Very Don't lent Good Good Fair Poor Know
I	Excel- Very Don't	a. Delivery of forwarded ▼ ▼ ▼ ▼ ▼
	lent Good Good Fair Poor Know	mail within reasonable number of days
	a. Waiting time in line	b. Delivery of forwarded
1	b. Convenience of hours U U U U U	mail to correct address
	c. Availability of parking L L L L L L L L	During the past 30 days, have you contacted the Postal
	d. Clerks were courteous and pleasant	Service to get information or report a problem? (if MORE
	e. Professional appearance	THAN ONE CONTACT, PLEASE THINK OF MOST RECENT.)
	of clerks	No (Go to Question #19)
1	f. Clerks worked efficiently and valued your time	Yes, to get information
۱	g. Clerks provided the	Yes, to report a problem
	information needed to complete your tasks	Thinking of your most recent contact, how did you contact the
	h. Signs and displays	Postal Service? (MARK ONE.)
	were helpful	Telephoned post office Telephoned a toll-free number
1	i. Lobby was clean and well maintained	
١	j. Overall rating of the	Written correspondence
	post office you visited	E-mail/Internet
1	most often	Went to Post Office
4	2 If you know, provide the ZIP Code of	Spoke with carrier
٦	the post office you visit most often	18 Thinking of your most recent contact, rate the Postal
	Not sure/Don't know	Service on:
Į		Excel- Very Don't lent Good Good Fair Poor Know
	When Device Commission	a. Ease of reaching some-
Ľ	Other Postal Services	one who could help
	Please mark the one response which best describes	b. Being dealt with in a
l	where you normally receive your mail. (MARK ONLY ONE.)	courteous, professional
	Individual mail slot or mailbox at your door	manner
١	Individual curbside mailbox	c. Speed of response
	Mailbox within cluster of boxes inside a building Mailbox within cluster of boxes outside a	d. Obtaining the information
1	building or home	or help you needed
	In a box at a post office (P.O. box)	e. Accuracy of the information
	Rented box somewhere other than at a post office	пиониции

Please rate the Postal Service advertising you lent Good Good Fair Poor heard have seen or heard in the past 30 days?	Demographics 24 Do you operate a business from your home? Yes No 25 Is anyone in your household employed by the U.S. Postal Service or by a national company which specializes in shipping or delivery of mail or packages? Yes No 26 About how many packages or pieces of mail do you send in an average month using the Postal Service? (MARK ONE) 0-10 pieces 21 or more pieces 11-20 pieces Don't know 27 Which do you use more frequently to mail packages? Postal Service Other delivery service 28 Have you purchased any merchandise over the Internet in the past 30 days? Yes No
Thinking about all aspects of U.S. Postal Service performance during the past 30 days, please rate the service you have received. Very	What is your age? Under 25 years
d. Easy to use/ Convenient	Additional comments: Is this a: Compliment Suggestion Problem Thank you for completing this survey!

THE PERSON SUPERING BUSINESS & CONCOUNTS SERBERG TOOPS SUPERING

Survey Instructions

Please follow the steps below carefully when completing this survey.

- •Use a blue or black ink pen that does not soak through the paper.
- •Make solid marks that fit in the response boxes. (Make no stray marks on the survey.)

RIGH	WAS		WRONG	WAY	
IXI	9	8	以	7	å

General Ratings	(continued)
Thinking about the service your business received from the U.S. Postal Service in the past 30 days, how would you rate the U.S. Postal Service on each of the following: (Please MARK ONE ANSWER BY PUTTING AN "X" IN THE APPROPRIATE BOX [X] FOR EACH STATEMENT.)	i. The length of time it usually takes for a First-Class letter mailed in your local area to be delivered in your local area □ □ □ □ □ j. The length of time it usually takes for a First-Class letter mailed in your local area to
a. Providing products and services to meet the needs v v v v v v v v v v v v v v v v v v v	be delivered in other parts of the country k. Delivery of mail to the correct address L. Delivery of mail in good
c. Having employees who interpret rules and regulations consistently	condition
e. Notifying your business of changes to rules and regulations	2 Based on your company's experiences in the past 30 days, please rate the following U.S. Postal Service facilities.
out of their way to meet your mailing needs	a. Post Office your business uses most b. Postal Business Center
h. Having employees who are knowledgeable about U.S. Postal Service products and services	c. Business Mail Entry Unit (BMEU) d. Rates and Classification Center Center

Mail Your Business neceives	Mail four business sen
Thinking about mail delivered to your company by a U.S. Postal Service carrier during the past 30 days, how would you rate the U.S. Postal	Thinking about the mail your company so the U.S. Postal Service in the past 30 day would you rate the U.S. Postal Service or
Service on	Onteons Mall Car
a. Time of day mail is delivered to your location	un times U b. Reliability of mail pick up
mail to your location within a half bour of the same time each day.	c Number of pick in times Man
c. Appearance of your letter a carrier	30 days, please rate the following U.S.P. Service products and services your busing for sending mail.
During the past 30 days, did you typically receive your mail at this location.	
☐ After noon ☐ Carrier does not deliver mail to this location ☐ Don't Know	a. Priority Mail
During the past 30 days // *******************************	d. Discounted First-Class Mail (presorted, bar-coded)
MARK THE BOX INDICATING HOW MANY TIMES.)	e. Periodicals (e.g., magazines, newspapers)
a. Have you received mail intended for a different address?	g. Standard Mail (B) (parcels)
b. Have you received damaged mail? During the past 30 days, has any of your business's	During the past 30 days, have you experi- by the U.S. Postal Service in processing your postage account(s)?
mail been delivered to a Postal Service post office box?	☐ Never Say ☐ Once a week or less ☐ 2 to 3 times a week
☐ No (please go to Question #7.) (if "Yes," have the following occurred in the past 3. 30 days? (If "No," MARK THE "NOT AT ALL" BOX,	Nearly every day Recommendation of the Not Applicable Recommendation of the Not Appli
W. TP "YES," MARK HOW MANY TIMES.)	Post Office Experience
	During the past 30 days, how many time
How often in past 30 days. a. Delivery of mail later than the	a post office for business needs? Not at all (please go to Question #14.)
posted time	1-2 times
your post office box \Box \Box \Box \Box	☐ 3-5 times ☐ More than 5 times
Does your business use caller service for receiving mail?	12 What is the ZIP Code of the post office y
☐ Yes ☐ No	
	□ Don't know

13 Platternia Propose nitravali viitamose one valvali	Bulk Rate/Discounted Mail
	IN the past 30 days, has your company sent out any
	wo bulk rate or other discounted mail, such as presorted
Convenience of nours	or prebarcoded mail? (PLEASE INCLUDE MAIL SENT THROUGH.
when post office is open	A SHIRD PAKTY/VISIDOR)
b. Waiting time in line	TO TAXES MARKET SEE NO (please go to Question #20.)
Contraction Contraction	Please rate the U.S. Postal Service on
Contact with the USPS	Francisco Control
In the past 30 days, have you contacted the U.S. Postal	Scrippment needed for
Service about any aspects of your service.	preparing mailings
F. C. Committee Land Design Design 119	b) sevel of service provided:
Who was the contact with?	D/Cimployer (1907), time (1907)
(MARKAL YEAT APPLY)	Ac. (Delivering mail within the 18-24-86)
Postal Camera 1945	expected number of days
☐ Account Representative	Questions to Classify Your Answers
Consumer Affairs Office	
Personnel at Business Mail Entry Unit	Which one of the following job titles best describes your
Personnel at your local postal office	position?
☐ National Service Center (Call Center) ☐ Postmaster	☐ Corporate Officer/Owner. ☐ Financial Operations
Postal Business Center	☐ Financial Operations ☐ Mail Operations
Other	Administrative/Clerical
	Other
What was the purpose of the contact? (MARKALL THAT APPLY)	21 The following are business purposes for sending mail
☐ To request information about U.S. Postal Service	via the U.S. Postal Service. Please indicate which three
products or services	business purposes best describe how the mail is used by
☐ ¶o seek clarification/information on U.S. Postal Service	your business. (MARK UP TO THREE THAT APPLY)
rules or regulations 🚗 😲 💮 👢 😘 👟	A D Payments
☐ To seek assistance on a business mailing problem	Catalogs (Asset) Asset (Asset)
□ To make a complaint	□ Newspapers
	☐ 《Communications ② ② ② ② ② ② ② ② ③ ② ③ ② ③ ② ③ ③ ③ ③ ③
Please rate the U.S. Postal Service on	Direct Mail
Section 2	☐ Magazines
	Retail products & services
a. Ease of getting through to a person when you phoned	Fig. 7 Two-Day Delivery → Fig. 1
b. Ability to meet your	Standard Delivery (parcels)
needs/solve your problem 🔲 🔲 🔲 🔲 🔲	Bills and Statements (e.g., accounts, invoices)
c. Accuracy of the information	Overnight Package Delivery (e.g., Express Mail)
you received	Reduced rate packages (library rate)
d. Speed with which your request/complaint was	☐ Other
handled	22 Please estimate your location's annual expenditures on
	U.S. Postal Service products and services.
	Less than \$1,000
	\$1,000 - \$9,999
	LOUIL KIOW
一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个	please continue on next page 🛧

Do you prepare or send mail for other companies? Service Do you contract with an outside company (e.g., presort house, mailing service, or printer) to prepare or send mail for your company? Once No (please to to Question #24) How much of your mail as prepared and/or sent by an outside company? Once Side Si
Do you contract with an outside company (e.g., presort bouse, malling service, or printer) to prepare or send mail for your company? real No (please to to Question #26) Not at all Once No (please to to Question #26)
house, mailing service, or printer) to prepare or send mail for your company?
mail for your company? No please po to Question #26. No much of your mail as prepared anti/or sent by an outside company? 304, 25%,
How much of your mail as prepared and/or sent by an outside company? 304, 2554,
How much of your mail is prepared anti/or sent by an outside company? 304-25% 751% 93% 166% - 100% 167% -
coutside company? Ox -25% F51% -75% 26% -50% F51% -75% Overall Performance Overall Performance
Overall Performance Thinking about all aspects of U.S. Postal Service; performance during the past 30 days, please rate the service your business has received? Receilent Poor Poor Don't Know To you intend to increase your use of the following products and services over the next 12 months?
Overall Performance Thinking about all aspects of U.S. Postal Service performance during the past 30 days, please rate the service your business has received?
Overall Performance Thinking about all aspects of U.S. Postal Service performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the past 30 days, please rate the performance during the performa
Thinking about all aspects of U.S. Postal Service as performance during the past 30 days, please rate the past 30 days, please
performance during the past 30 days, please rate the service your business has received? Excellent Very Good Pair Very Good Pair Very Good Very Goo
performance during the past 30 days, please rate the service your business has received? Excellent Very Good Pair Very Good Pair Very Good Very Goo
Excellent Good Fair Don't Know Do you intend to increase your use of the following products and services over the next 12 months? What, if anything, could the U.S. Postal Service do to increase your overall satisfaction with the quality of
☐ Very Good ☐ Good ☐ Fair ☐ Poor 2 ☐ Don't Know ☐ Do you intend to increase your use of the following products and services over the next 12 months? What, if anything, could the U.S. Postal Service do to increase your overall satisfaction with the quality of
Good * Go
☐ Fair ☐ Poor ☐ Don't Know ☐ Don't Know ☐ Do you intend to increase your use of the following products and services over the next 12 months? What, if anything, could the U.S. Postal Service do to increase your overall satisfaction with the quality of
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Do you intend to increase your use of the following products and services over the next 12 months? What, if anything, could the U.S. Postal Service do to increase your overall satisfaction with the quality of
Do you intend to increase your use of the following what, if anything, could the U.S. Postal Service do to products and services over the next 12 months? In anything, could the U.S. Postal Service do to increase your overall satisfaction with the quality of
products and services over the next 12 months?
The No correctly see products and services it provides to your company.
a. Priority Mail DD D D
b. Express Mail
C. Standard Mail (A) (advertising) \Box \Box \Box
al Standard Mail (B) (parcels)
28 Would you recommend the following products and
services to your business associates?
No experience tes No with product it
a. Priority Mail
6. Express Mail
od. Standard Mail (B) (parcels)

Your answers to these questions will be kept confidential and will only be used to identify groups of similar respondents for statistical purposes.

Thank you for completing this survey!

Please return completed survey to: The Gallup Organization P.O. Box 82570 Lincoln, NE 68501-9571

OCA/USPS-8 Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at pages 9 and 10, lines 21-30, and 1-9, respectively.

- (a) For each bulleted item, (i) give an example, (ii) provide the volume, or an estimate of the volume, or a percentage of the manual letter-shaped volume, and (iii) the unit cost of processing.
- (b) Bullet six identifies nonmachinable letter-shaped mailpieces that do not bend in transport. Are there other types of letter-shaped mailpieces processed manually because of problems in transport (e.g., glossy envelopes)? Please explain.
- (c) Has the Postal Service become aware of any other examples of nonmachinable letter-shaped mailpieces since the preparation of her testimony?

RESPONSE:

(a) The criteria referenced in witness Kingsley's testimony pertain to the mail piece characteristics that influence the machinability of letter-size mail.

Category	Example(s)
Nonstandard aspect ratio	square greeting card
	or a long and short
	"bookmark-type" item
Polybagged/wrapped items	cards or inserts that are
	combined and enclosed in
	shrinkwrap or polywrap
	instead of an envelope
Closure devices	protrusions like a button,
	string, or clasp on an
	inter-office or flat envelope
Non-rectangular mail piece	round, irregular, triangular

RESPONSE TO OCA/USPS-8 (Continued)

Rigid enclosures

pencils, pens, loose coins

Overly stiff mail pieces

metal insert or plastic

"jewel-type" case

Flimsy mail pieces

tissue-type paper with

pull-out type insert

Mis-oriented address

address parallel to

shortest (instead of

longest) dimension

Folded short edge

short piece that is long and

folded in half

Booklets with bound short edge

small catalogue

Glossy postcards

postcard with glossy

picture image on non-

address/message side

Labeled "manual only" processing

for marketing purposes,

mailer wants the piece to

"open up" in recipient's

hand when they pick it up,

to prompt a higher

response rate

RESPONSE TO OCA/USPS-8 (Continued)

- (ii) Data are only available for letters that do not meet the aspect ratio requirement. The FY 2000 volume is 61,785,883 (USPS LR-J-60, page 45).
- (iii) Data are only available for letters that do not meet the aspect ratio requirement. The test year 2001 unit cost estimate is 18.934 cents (USPS LR-J-60, page 45)
- (b) Virtually all of the items listed in the reference above either impact or are impacted by the transport belts, except letters with mis-oriented addresses, glossy postcards and trays labeled for "manual only" processing.
- (c) Not at this time. The vast majority of the list came from requirements in DMM C810.

OCA/USPS-9. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 5, footnote 9. Please confirm that the increase from 68 percent currently to an expected 93 percent in FY 03 is reflected in the roll forward. If you do not confirm, please explain.

Response:

Confirmed.

OCA/USPS-10 Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 11, lines 14-15.

- (a) Please confirm that 8.9 percent of all letters in AP12, FY 01 did not have 9- or 11-digit barcodes. If you do not confirm, please explain.
- (b) Please confirm that the 8.9 percent of all letters not barcoded to nine or eleven digits are processed manually. If you do not confirm, please explain.
- c) Please identify what factors are preventing the 8.9 percent of all letters not currently barcoded from being barcoded, and describe how the Postal Service plans to have barcodes applied to these letters.

RESPONSE:

- (a) Confirmed.
- (b) Not confirmed. Letters without nine-digit or eleven-digit barcodes may be processed manually through some operations, but not necessarily all operations. For example, letters with 5-digit barcodes can still be sorted to the ZIP Code in automated outgoing or incoming primary operations, but would then have to be processed manually in an incoming secondary operation.
- (c) Not all zones are sorted to carrier route on automation due to their very small size or distance from a facility with automation. In these instances, only a 5-digit barcode would be necessary. USPS-T-39 (page 11, lines 23-24) states that, of the automation incoming secondary volume, four percent is sorted to 5-digit. Factors that prevent all letters from being barcoded for automated zones include, but are not limited to, pieces that are non-machinable or contain insufficient address information. The Postal Service's proposal to surcharge non-machinable letters may shift more letter volume to meet machinable characteristics and hence more barcodes.

OCA/USPS-11. 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 Sorters (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 First-Class 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.

Response:

- a. The LIPS program and a mixed mail sorter (handles letters and flats) are the only locally procured equipment purchased by the field.
- b. See response to OCA/USPS-5.

OCA/USPS-12 Please refer to the testimony of Michael Miller (USPS-T-22), and USPS LR-J-60, Part A., "First-Class Mail Letters/Cards." There are 17 cost model spreadsheets for letters/cards: First-Class Single-Piece Handwritten Letters; First-Class Single-Piece QBRM Letters; First-Class Single-Piece Metered Letters; First-Class Mail Nonauto Machinable Mixed Mix AADC/AADC Presort Letters; First-Class Mail Nonauto Machinable 3-Digit Presort Letters; First-Class Mail Nonauto Nonmachinable MACD Presort Letters; First-Class Mail Nonauto Nonmachinable ADC Presort Letters: First-Class Mail Nonauto Nonmachinable 3-Digit Presort Letters; First-Class Mail Nonauto Nonmachinable 5-Digit Presort Letters; First-Class Mail Auto Mixed Mix AADC Presort Letters; First-Class Mail Auto Presort Letters; First-Class Mail Auto 3-Digit Presort Letters; First-Class Mail Auto 5-digit Presort Letters (Other Sites); First-Class Mail Auto 5-Digit Presort Letters (CSBCS/Manual Sites); First-Class Mail Auto Carrier Route Presort Letters: First-Class Mail Nonstandard Single-Piece Letters; and, First-Class Mail Nonstandard 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 17 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 First-Class letter-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class letter-shaped mail provided in response to part (b) are greater than the standards for First-Class letter-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the 17 cost model spreadsheets represent different mailstreams for the processing of all letter-shaped First-Class Mail. If you do not confirm, please explain and identify all mailstreams for the processing of letter-shaped First-Class Mail.

RESPONSE:

(a) Each cost spreadsheet in USPS LR-J-60 contains the identical operations.

As shown below, the operations listed next to the same reference number use

the same equipment. In addition, this list does not include all support equipment.

RESPONSE TO OCA/USPS-12 (Continued)

Oper	ation	Equipment
(1)	Package sorting	Conveyors, hampers, pouch racks
(2)	Outgoing ISS/RCR Incoming ISS/RCR	AFCS-ISS: USPS-T-39, page 3 at 20 DIOSS: USPS-T-39, page 9 at 21 MLOCR-ISS: USPS-T-39, page 4 at 17 RCR: USPS-T-39, page 5 at 21
(3)	Outgoing REC Incoming REC	Video Display Terminals (VDT): USPS-T-39, page 5 at 20
(4)	Outgoing OSS Incoming OSS	DBCS-OSS: USPS-T-39, page 6 at 20 DIOSS: USPS-T-39, page 9 at 21 MPBCS-OSS: USPS-T-39, page 5 at 24
(5)	Outgoing LMLM Incoming LMLM	LMLM: USPS-T-39, page 7 at 30
(6)	Outgoing Primary (Auto) Outgoing Secondary (Auto) Incoming MMP (Auto) Incoming SCF/Primary (Auto)	DBCS: USPS-T-39, page 6 at 9 MPBCS: USPS-T-39, page 7 at 14
(7)	Outgoing Primary (Manual) Outgoing Secondary (Manual) Incoming MMP (Manual) Incoming SCF/Primary (Manual)	Letter Cases: USPS-T-39, page 10 at 24
(8)	5-Digit Barcode Sort	DBCS: USPS-T-39, page 6 at 9 MPBCS: USPS-T-39, page 7 at 14
(9)	Auto Carrier Route	DBCS: USPS-T-39, page 6 at 9 MPBCS: USPS-T-39, page 7 at 14
(10)	Auto 3-Pass DPS	CSBCS: USPS-T-39, page 7 at 1
(11)	Auto 2-Pass DPS	DBCS: USPS-T-39, page 6 at 9 MPBCS: USPS-T-39, page 7 at 14
(12)	Man Inc Sec (Plant) Man Inc Sec (DU)	Letter Cases
(13)	Box Section Sort	Letter Cases

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE RESPONSE TO OCA/USPS-12 (Continued)

- (b), (c) See response to OCA/USPS-5.
- (d) It is not possible to either confirm or not confirm this statement. As discussed in the response to OCA/USPS-6(a), the term "mailstream" is a generic term that can be used in several different contexts. The cost models that are contained in USPS LR-J-60 were created to support specific rate proposals in this docket and are not an exhaustive list of models that could be used to depict every possible grouping ("mailstream") for letters and cards.

OCA/USPS-13 Please refer to the testimony of Michael Miller (USPS-T-24), and USPS LR-J-61, Part A., "First-Class Mail Flats." There are nine cost model spreadsheets for flats: Nonauto Presort; Mixed ADC Nonauto Presort; ADC Nonauto Presort; 3-Digit Nonauto Presort; 5-Digit Nonauto Presort; Mixed MADC Auto Presort; ADC Auto Presort; 3-Digit Auto Presort; 5-Digit Auto Presort. Each cost model spreadsheet identifies the following operations: Outgoing primary Package); Incoming MMP (Package); Incoming Primary (Package); Incoming Secondary (Piece); Incoming Secondary (Piece); Incoming Primary (Piece); and, Incoming Secondary (Piece).

- (a) Please identify each piece of mail processing equipment for each operation in the 9 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 First-Class flat-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class flat-shaped mail provided in response to part (b) are greater than the standards for First-Class flat-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the nine cost model spreadsheets represent different mailstreams for the processing of all flat-shaped First-Class Mail. If you do not confirm, please explain and identify all mailstreams for the processing of flat-shaped First-Class Mail.

RESPONSE:

(a) Each cost spreadsheet in USPS LR-J-61 contains the same operations. As shown below, the operations listed next to the same number use the same equipment. In addition, this list does not include all support equipment.

Facilians and

Operation		Equipment
(1)	Package sorting Mechanized (All processing levels)	LIPS: USPS-T-39, page 23 at 11 SPBS: USPS-T-39, page 22 at 26
(2)	Package sorting Manual (All processing levels)	Conveyors, hampers, pouch racks USPS-T-39, page 24 at 1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE RESPONSE TO OCA/USPS-13 (Continued)

Operation		Equipment
(3)	AFSM100 Auto (All processing levels)	AFSM100: USPS-T-39, page 15 at 20
(4)	VCS Keying (All processing levels)	Video Display Terminals (VDT): USPS-T-39, page 15 at 27
(5)	FSM881 Auto (All processing levels)	FSM881: USPS-T-39, page 14 at 23
(6)	FSM1000 Auto (All processing levels) FSM1000 Keying (All processing levels)	FSM1000: USPS-T-39, page 15 at 4
(7)	Manual (All processing levels)	Flats Cases: USPS-T-39, page 17 at 14

- (b), (c) See response to OCA/USPS-5.
- (d) It is not possible to either confirm or not confirm this statement. As discussed in the response to OCA/USPS-6(a), the term "mailstream" is a generic term that can be used in several different contexts. The cost models that are contained in USPS LR-J-60 were created to support specific rate proposals in this docket and are not an exhaustive list of models that could be used to depict every possible grouping ("mailstream") for flats.

OCA/USPS-14: Please provide a copy of the USPS window clerk training manual. Include in your response all information, scripts, and other material developed to implement the Postal Service's "greet, inquire, suggest, thank (GIST) system of quality retail service. "See Docket No. R2000-1, USPS-LR-I-200 at 3.

RESPONSE:

The requested materials are being filed as USPS-LR-J-144, Window Clerk Training Materials, Provided in Response to OCA/USPS-14.

Response of United States Postal Service to

Interrogatories of Office of the Consumer Advocate

OCA/USPS-15. Please provide tabulations of total base-year revenue and volume-variable costs by the following categories of First-Class Letters and Sealed Parcels. If data for some cells of the tabulations are not available, please provide the most recent available data for as many cells as possible. If any of the requested information has already been filed, please provide a citation (by tabulation cell) to document title, page number, line number, and column number. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

- (a) All mail.
- (b) Please provide a break-down of the response to Part **a** of this interrogatory by shape (*i.e.*, by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (c) Please provide a break-down of the response to Part **b** of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.
- (d) Please provide a break-down of the response to Part **c** of this interrogatory by whether mail is discounted.
- (e) Please provide a break-down of the response to Part **d** of this interrogatory by whether mail is automation compatible.
- (f) Please provide a break-down of the response to Part **b** of this interrogatory by whether mail is discounted.
- (g) Please provide a break-down of the response to Part **b** of this interrogatory by whether mail is automation compatible.
- (h) Please provide a break-down of the response to Part **f** of this interrogatory by whether mail is automation compatible.
- (i) Please provide a break-down of the response to Part g of this interrogatory by whether mail is discounted.
- (j) Please provide a break-down of the response to Part *h* of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.
- (k) Please provide a break-down of the response to Part *i* of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.

Response of United States Postal Service to Interrogatories of Office of the Consumer Advocate

Response:

- (a) The total base year postage revenue for First-Class Letters and Sealed Parcels is \$34,327.1 million. See Direct Testimony of Bradley V. Pafford (USPS-T-3), Table 1 page 9. This estimate is obtained by adding Single Piece First-Class Letters, Flats and IPPs, Total Presort Non-Cards and Auto Carrier Route Presort Letters. Total base year volume variable costs of \$16,935.2 million for First-Class Letters and Sealed Parcels can be found in Exhibit C, column C, of USPS-T-11.
- (b) The requested revenue breakdown is \$29,325.6 for letters, \$5,336.0 million for flats and \$671.6 million for non-letter, non-flat mail. The requested cost breakdown will be filed in LR-J-105. See also USPS LR-J-46.
- (c) The requested revenue breakdown for the portion of the figure subject to the nonstandard surcharge is \$33.7 million for letters, \$205.9 million for flats and \$25.0 million for non-letter, non-flat mail. The requested cost breakdown for flats and parcels will be filed in LR-J-105. See also USPS LR-J-46. The requested cost breakdown for letters is not available.
- (d) The requested revenue breakdown for the discounted portion of the figure subject to the non-standard surcharge is \$5.6 million for letters, \$37.2 million for flats and \$2.3 million for non-letter, non-flat mail. The requested

Response of United States Postal Service to Interrogatories of Office of the Consumer Advocate

cost breakdown for flats and parcels will be filed in LR-J-105. See also USPS LR-J-46. The requested cost breakdown for letters is not available.

- (e) No data are available by the category "automation compatible."
- (f) The requested revenue breakdown for the portion of the figure in OCA/USPS-15b that is discounted is \$12,129.6 million for letters, \$537.3 million for flats and \$6.2 million for non-letter, non-flat mail. Except for the QBRM discounted mail that is included in First-Class Single Piece, the requested cost breakdown for the portion of the figure in OCA/USPS-15b that is discounted will be filed in LR-J-105. See also USPS LR-J-46.
- (g) see e) above.
- (h) See e) above.
- (i) See e) above.
- (j) See e) above.
- (k) See e) above.

OCA/USPS-16. Please provide tabulations of total test-year revenue and volume-variable costs on the bases requested in Interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

Response:

- a) Test year postage revenue for First-Class Letters Subclass by Rate Category can be found on page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29). The volume variable costs for First-Class Single Piece Letters and Presort Letters can be found in witness Patelunas's (USPS-T-12) Exhibit USPS-12G (Current Rates) and Exhibit USPS-12I (After Rates).
- b) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. For available cost data, please refer to USPS-LR-58. The data for Single-Piece Letters can be found in workbook Lr58asp.xls on the following sheets:

SP Letters (detailed)
SP Flats (detailed)
SP Parcels (detailed)
SP Parcels (combined)
SP Parcels (combined).

The data for Presort Letters can be found in workbook Lr58PRE.xls on the following sheets:

Presort Letters (detailed)
Presort Flats (detailed)
Presort Parcels (detailed)
Pre Letters (combined)
Pre Flats (combined)
Pre Parcels (combined).

Response continued:

- c) Please refer to the information provided in response to part b) of this question all First-Class flats and parcels weighing less than one ounce are, by definition, nonstandard. The data are not available for nonstandard letters.
- d) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. The requested cost data are the presorted portion of the First-Class flats and parcels weighing less than one ounce that was provided in response to part c) of this question.
- e) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."
- f) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. Except for the QBRM discounted mail that is included in First-Class Single Piece, the requested cost data is the presorted portion of the First-Class mail that was provided in response to part b) of this question.
- g) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."

Response continued:

- h) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."
- i) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."
- j) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."
- k) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue is available. No cost data are available by the category "automation compatible."

Response of United States Postal Service to Interrogatories of Office of the Consumer Advocate

OCA/USPS-17. Please provide tabulations of base-year rates (or average revenue per piece) and unit volume-variable costs for the categories of First-Class Letters and Sealed Parcels on the bases requested in interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

Response:

- (a) Total base year postage revenue per piece for First-Class Letters and Sealed Parcels is \$0.35. See Direct Testimony of Bradley V. Pafford (USPS-T-3), Table 1 page 9, as discussed in OCA/USPS-15a and Table 2 page 11. The base year average unit volume variable cost of \$0.173 for First-Class Letters and Sealed Parcels can be found in Exhibit C, column E of USPS-T-11.
- (b) The requested breakdown of the figure in OCA/USPS-17a is \$0.30 for letters, \$0.96 for flats and \$1.34 for non-letter, non-flat mail. The requested cost breakdown will be filed in LR-J-105. See also USPS LR-J-46.
- (c) The requested breakdown for the revenue subject to the non-standard surcharge is \$0.44 for letters, \$0.44 for flats and \$0.50 for non-letter, non-flat mail. The requested cost breakdown for flats and parcels can be found in LR-J-105. See also USPS LR-J-46. The requested cost breakdown for letters is not available.
- (d) The requested breakdown for the discounted portion of the revenue subject to the non-standard surcharge is \$0.38 for letters, \$0.34 for flats

Response of United States Postal Service to Interrogatories of Office of the Consumer Advocate

and \$0.38 for non-letter, non-flat mail. The requested cost breakdown for flats and parcels will be filed in LR-J-105. See also USPS LR-J-46. The requested cost breakdown for letters is not available.

- (e) No data are available by the category "automation compatible."
- (f) The requested breakdown for the portion of the figure in OCA/USPS-17b that is discounted is \$0.27 for letters, \$0.73 for flats and \$0.62 for non-letter, non-flat mail. Except for the QBRM discounted mail that is included in First-Class Single Piece, the requested cost breakdown for the portion of the figure in OCA/USPS-15b that is discounted will be filed in LR-J-105. See also USPS LR-J-46.
- (g) See e) above.
- (h) See e) above.
- (i) See e) above.
- (j) See e) above.
- (k) See e) above.

OCA/USPS-18. Please provide test-year rates (or average revenue per piece) and unit volume-variable costs for the categories of First-Class Letters and Sealed Parcels on the bases requested in interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

Response:

- a) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for test year postage revenue and volume for First-Class Letters Subclass by Rate Category. Please refer to witness Patelunas's (USPS-T-12) Exhibit USPS-12G (Current Rates) and Exhibit USPS-12I (After Rates) for the volume variable costs for First-Class Single Piece Letters and Presort Letters, and Exhibit USPS-12A for the associated volumes.
- b) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. Please refer to the response to OCA/USPS-16b) for the available cost data.
- c) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. Please refer to the response to OCA/USPS-16c) for the available cost data.

Response continued:

- d) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. Please refer to the response to OCA/USPS-16d) for the available cost data.
- e) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."
- f) Please refer to page 1 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. Please refer to the response to OCA/USPS-16f) for the available cost data.
- g) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."
- h) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."
- i) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."
- j) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."

Response continued:

k) Please refer to page 1 of 2 Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available. No cost data are available by the category "automation compatible."

OCA/USPS-19. Please provide the tabulations requested in interrogatories OCA/USPS-15-18 separately for First-Class Cards, Post Cards, and Postal Cards. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

Response:

(a)-(k) The requested data are not available by the categories First-Class Cards, Post Cards and Postal Cards. In the RPW system, the latter two items are not separate rate components of the general "Cards" category. Additionally, with respect to the questions on mail shape asked above, all items in the Cards category have a card shape. Note also that cards are never assessed a nonstandard surcharge so data on this aspect are not available. Finally, information on cards is not available by the category "automation compatible." The following provides as much information for cards as is available given the above. Revenue for all First-Class cards is \$1,006.1 million. See Direct Testimony of Bradley V. Pafford (USPS-T-3), Table 1 page 9 and Table 2 page 11. Revenue per piece for all First-Class cards is \$0.18 per piece. Total base year volume variable costs for First-Class Cards can be found in Exhibit C, column C of USPS-T-11. The total average unit volume variable cost for First-Class Cards can be found in Exhibit C, column E of USPS-T-11.

For test year data, please refer to page 2 of 2 of Attachment D of the testimony of witness Robinson (USPS-T-29) for whatever test year postage revenue and associated volume is available for First-Class Cards Subclass by Rate Category. Please refer to witness Patelunas's (USPS-T-12) Exhibit USPS-12G (Current Rates) and Exhibit

Response continued:

USPS-12I (After Rates) for the volume variable costs for First-Class Single Piece Cards and Presort Cards, and Exhibit USPS-12A for the associated volumes.

Response of United States Postal Service to Interrogatories of Office of the Consumer Advocate

OCA/USPS-20. Please provide a tabulation of base-year volumes of First-Class Letters and Sealed Parcels by ounce increment by shape (i.e., letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail). This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

Response: See USPS-LR-J-112, Tables 11 and 12, pages 30 and 31,

respectively.

OCA/USPS-21. Please refer to the response of the Postal Service to interrogatory DBP/USPS-22 in Docket No. C2001-1, September 10, 2001. The Postal Service states,

[T]echnology resources affecting the ability to meet the outgoing processing workload have changed materially in recent years. Improvements in equipment capabilities, such as handwriting recognition, have enhanced the Postal Service's ability to process outgoing lettershaped mail, of which the vast majority of collection mail consists. The achieved throughputs on the equipment have increased, with the result that the capacity exists to handle more collection mail within a shorter operating window. Emblematic of these changes in the operating environment over the last several years has been the Postal Service's ability to send less mail to the Remote Encoding Centers, and, in fact, to begin[] closing RECs over this period.

- (a) Please identify all "improvements in equipment capabilities" that occurred between the base year in R2000-1 and the base year in this docket.
- (b) Please identify all "improvements in equipment capabilities" that occurred in FY 2001.
- (c) Please identify all "improvements in equipment capabilities" that the Postal Service expects will occur between the base year and the test year of this docket. Please provide citations to roll-forward documentation showing how the "improvements in equipment capabilities" translate into reduced expenses in the test year.
- (d) Please provide citations to roll-forward documentation showing how improvements in "handwriting recognition" translate into reduced expenses in the test year.
- (e) Please provide the change in cost avoidance between the base years of R2000-1 and this docket, for each worksharing discount in First-Class Mail, resulting from improvements in "handwriting recognition."
- (f) Please provide the proportion and absolute volume of handwritten First-Class letter-shaped mail that was successfully barcoded by "handwriting recognition" equipment in the most recent AP, quarter, and fiscal year for which data are available.
- (g) Please provide the proportion and absolute volume of handwritten First-Class letter-shaped mail that is projected to be successfully barcoded by "handwriting recognition" equipment in the test year of this docket.
- (h) Please provide the proportion and absolute volume of handwritten First-Class card-shaped mail that is projected to be successfully barcoded by "handwriting recognition" equipment in the test year of this docket.

Response:

- (a) All "improvements in equipment capabilities" that occurred between the base year in R2000-1 (Base Year 1998) and the base year in this docket (Base Year 2000) are best represented by the cost reductions programs existing between those years. The relevant cost reductions in the Docket No. R2000-1 filing can be found in USPS-LR-126, Exhibit E. The cost reductions were updated in response to Order No. 1294, and a comparison between the filing and the update can be found in Exhibit USPS-ST-44Z of the supplemental testimony of witness Patelunas (USPS-ST-44).
- (b) All "improvements in equipment capabilities" that occurred in FY 2001 can be found in USPS-LR-J-49. Exhibit E, page 1.
- occur between the base year and the test year of this docket can be found in USPS-LR-J-49, Exhibit E, pages 1-3. The first sentence of the quoted response to DBP/USPS-22 in Docket No. C2001-1, September 10, 2001, states [T]echnology resources affecting the ability to meet the outgoing processing workload have changed materially in recent years." As such, the response refers to mail processing, and all mail processing cost reductions and how the cost reductions are reflected in classes of mail and special services is shown in the testimony of witness Patelunas (USPS-T-12), Appendix A.
- (d) Please refer to witness Patelunas (USPS-T-12), Appendix A. Pages 6-8 show the savings in thousands of workhours (the same information is available on

Response continued:

pages 1-3 of Exhibit E of USPS-LR-J-49). Pages 9-11 of USPS-T-12, Appendix A, display the dollar savings by program (in thousands), grouped by distribution key. The "handwriting recognition" savings are associated with the "RCR 2000" and "Recognition Improvement" programs within distribution key 1446, RBCS. Pages 20-22 show the expenses by year for each distribution key.

(e) Handwritten mail pieces are not extended a discount. Consequently, any improvements in the ability of mail processing equipment to finalize mail pieces with handwritten addresses would only have an impact on worksharing related savings estimates when handwritten letters costs are used as a benchmark.

The First-Class Mail presort rate categories use Bulk Metered Mail (BMM) letters costs as the benchmark. In reality, a small portion of these mail pieces would contain handwritten addresses. However, it is not possible to determine the extent to which this portion of BMM letters would have affected BMM letters costs as a result of improved handwriting recognition technologies. Consequently, it is not possible to determine the extent to which these improvements would have affected the worksharing related savings estimates for the First-Class Mail presort rate categories between Docket Nos. R2000-1 and R2001-1.

The Qualified Business Reply Mail (QBRM) worksharing related savings estimate uses handwritten letters costs as a benchmark. The comparison of Docket No.

Response continued:

R2000-1 and R2001-1 results, however, is problematic for two reasons.

First, the Postal Service has changed the way it views these improvements and the models were subsequently changed. Namely, the Postal Service now focuses on the aggregate Multi Line Optical Character Reader Input Sub System / Remote Computer Read (MLOCR-ISS/RCR) finalization rate, rather than focusing solely on the RCR finalization rate.

Second, the wage rates and other inputs used between dockets have changed.

Consequently, a comparison of the savings would be meaningless.

In order to evaluate the extent to which letter recognition enhancement technologies have affected costs, one could modify the cost model inputs and evaluate the results in the cost models contained in USPS LR-J-60. Such an analysis was described in USPS-T-22, page 27 at 20-27.

- (f) These data are not available.
- (g) These data are not available.
- (h) These data are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO OCA INTERROGATORIES

OCA/USPS-21A. Please provide the following information for Priority Mail for the most recent year-long period available. If some of the requested data are only available for a shorter period, please provide the data for the longest possible period.

- (a) Volume by weight increment (please treat flat rate separately) by shape (i.e., by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (b) The volume data requested in Part a of this interrogatory further broken down by presort level.
- (c) Proportion and absolute volume that receives its first sort on flat sorting equipment, by weight increment (please treat flat rate separately) by shape (i.e., by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (d) The volume data requested in Part c of this interrogatory further broken down by whether the Postal Service applies a bar code.
- (e) The volume data requested in Part c of this interrogatory further broken down by whether the mailer applies a bar code.

RESPONSE:

- (a): The available data responsive to this interrogatory are reproduced in the attached tables. The data are for GFY 2000.
- (b)-(e): Not available. No data are available for Priority Mail disaggregated by presort level. No data are available that would allow disaggregation of volumes according to whether first sortations were performed on flat-sorting machines.

BREAKDOWN OF GFY-2000 VOLUME OF PRIORITY MAIL BY SHAPE WITHIN POUND INCREMENT FLAT RATE PRIORITY EXCLUDED

		I attac Malana	Flet \/ok	Other Shane Makema	Combined Volume
Pound increment	1	Letter Volume 12,894,842	Flat Volume 148,023,980	Other Shape Volume 193,796,794	354,715,616
	2	979,663	121,491,038	306,182,939	428,653,640
	3	115,623	8,466,037	138,198,670	146,780,330
	4	24,299	1,127,501	61,812,887	62,964,687
	5	17,741	368,550 139,340	31,615,511 17,768,409	32,001,802 17,905,458
	6 7	8,709 5,778	128,3 4 0 74,369	11,540,291	11,620,438
	8	2,552	25,905	8,042,507	8,070,964
	9	7,794	32,809	5,322,010	5,362,613
	10	295	16,707	3,958,424	3,975,426
	11	1,697 0	10,207 17,061	3,040,268	3,052,172 2,3 9 2,091
	12 13	758	7,267	2,375,030 1,781,572	1,789,597
	14	0	2,899	1,293,818	1,296,717
	15	216	9,804	1,207,784	1,217,804
	16	39	4,338	832,973	837,350
	17	0	314	•	753,312 564,757
	18 19	· 0	2,443 608	562,314 533,692	534,300
	20	ŏ	0		440,157
	21	Ô	271	379,636	379,907
	22	0	633		371,426
	23	0			306,411
	24 25	0			278,730 215,543
	26	0			182,238
	27	Õ			163,551
	28	0	923	145,407	
	29	0			96,506
	30	0			183,546 113,220
	31 32	0		• • • • • • • • • • • • • • • • • • • •	
	33	Ö			
	34	0	0	76,835	
	35	0		•	99,382
	36	0			
	37 38	0		· ·	
	39	0			
	40	0		•	36,331
	41	0			
	42	0		•	
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	60			28,375 13,88	
	61 62				
	63			2,52	
	64	C) (852	852
	65			2,959	
	66) 1,677 D 2,193	
	67 68			1,27°	
	69			2,74	
	70			1,84	

Attachment to
Response to
OCA/USES-21A(a)
Page 10(2

BREAKDOWN OF GFY-2000 FLAT RATE PRIORITY VOLUME BY POUND INCREMENTS - ALL SHAPES ASSUMED TO BE FLATS

Pound VOLUME Increment				
1 2 3 4 5 6 7 8 9	92,108,160 20,580,238 3,948,137 717,294 182,818 55,486 19,327 9,818 2,058 6,423 719			
12 13 14 15 16 17 18 19 20 21	7,561 493 6,939 589 0 26,210 0 0 650 0			
23 24 25 26 27 28 29 30 31 32 33	0 0 0 0 0 0 0 0 0 0 0			
35 36 37 38 39 40 41 42 43 44 45	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
46 47 48 49 50 51 52 53 54 55	0 0 0 0 0 0 0 0 663 0			
57 58 59 60 61 62 63 64 65 66 67 68 69	0 0 0 0 0 0 0 0 0 0 0			

Attachment to
Response to
OCA/USPS-21A(4)

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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.

Michael Tidwell

475 L'Enfant Piaza West, S.W. Washington, D.C. 20260–1137 October 12, 2001