

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-86-98)  
October 17, 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-86. Please refer to the testimony of witness Maura Robinson (USPS-T-29), Attachments A-F.

- a. In Attachment F, column (2), line (a), there appears the figure, 24.45 percent, which has a citation to USPS-LR-J-60 at page 50. Please provide a cell reference in USPS-LR-J-60 at page 50 for this percentage.
- b. Please provide the percentage figure for the "Nonmachinable Proportion" of single-piece First-Class letter-shaped mail comparable to the "Nonmachinable Proportion" of Nonautomation Presort found in Attachment F, column (2), line (a).
- c. Please confirm that the "Nonmachinable Proportion" of single-piece First-Class letter-shaped mail is higher than the "Nonmachinable Proportion" of Nonautomation Presort. If you do not confirm, please explain.
- d. In Attachment F, column (2), line (c), there appears the figure, 19.95 percent, representing the "Nonmachinable Proportion" of Automation Flats. Please provide the percentage figure for the "Nonmachinable Proportion" of single-piece First-Class flat-shaped mail comparable to the "Nonmachinable Proportion" of Automation Flats.
- e. Please confirm that the "Nonmachinable Proportion" of single-piece First-Class flat-shaped mail is higher than the "Nonmachinable Proportion" of Automation Flats. If you do not confirm, please explain.
- f. In Attachment C, column (3), line (i), please confirm that the volume of Nonautomated Presorted Letters "Nonstandard/Nonmachinable Pieces" in the test year, after rates represents a 2,246  $(875,140 / 38,966 * 100)$  percent increase from the test year, before rates. If you do not confirm, please explain.

- g. Please discuss the assumptions that explain the increase in Nonautomated Presorted Letters "Nonstandard/Nonmachinable Pieces" from 38,966 in the test year, before rates to 875,140 in the test year, after rates.
- h. In Attachment C, column (3), line (e), please confirm that the volume of Single-Piece Letters "Nonstandard/Nonmachinable Pieces" in the test year, after rates represents a 222 ( $942,633 / 424,198 * 100$ ) percent increase from the test year, before rates. If you do not confirm, please explain.
- i. Please discuss the assumptions that explain the increase in Single-Piece Letters "Nonstandard/Nonmachinable Pieces" from 424,198 in the test year, before rates to 942,633 in the test year, after rates.
- j. In Attachment C, columns (1), (2), and (3), please confirm that there is no increase in the proportion of Automated Presort Flats "Nonstandard/Nonmachinable Pieces" from the base year to the test year. If you do not confirm, please explain.
- k. Please discuss the assumptions that explain why there is no increase in the proportion of Automated Presort Flats "Nonstandard/Nonmachinable Pieces" from the base year to the test year.

OCA/USPS-87. Please refer to the testimony of witness Maura Robinson (USPS-T-29), Attachments A-F.

- a. In Attachment C, line (e), please confirm that the volume of Single-Piece Letters "Nonstandard/Nonmachinable Pieces" consists of letter-shape, flat-shape and nonletter/nonflat-shape pieces. If you do not confirm, please explain.

- b. In Attachment C, column (3), please confirm that Single-Piece Letters “Nonstandard/Nonmachinable Pieces” as a proportion of total Single-Piece Letters is 2.011 (942,633 / 46,865,402) percent. If you do not confirm, please explain.
- c. In Attachment C, column (3), please confirm that Nonautomated Presort Letters “Nonstandard/Nonmachinable Pieces” and Automation Presort Flats “Nonstandard/Nonmachinable Pieces” as a proportion of total Nonautomated Presort Letters, Automation Presort Letters and Flats, and Automation Carrier Route Letters is 1.985  $((875,140 + 143,545) / (3,579,306 + 46,872,325 + 870,451))$  percent. If you do not confirm, please explain.
- d. In Attachment F, the note states: “Assume single-piece mail has same proportion of nonmachinable mail as workshared mail.” Please explain the basis for this assumption.
- e. Please confirm that in the test year, after rates, Single-Piece Letter mail does not have the same proportion of nonmachinable mail as workshared mail. If you do not confirm, please explain.

OCA/USPS-88. Please refer to the testimony of witness Maura Robinson (USPS-T-29), Attachments A-F.

- a. In the test year, please confirm that First-Class Single-Piece mail weighing less than one ounce is 99.1 percent letter-shaped, 0.8 percent flat-shaped, and 0.1 percent parcel-shaped. (See USPS-LR-J-58 at 8). If you do not confirm, please explain.
- b. In Attachment C, column (3), line (b), please confirm that 99.1 percent of line (b) is 46,127,870. If you do not confirm, please explain.

- c. In Attachment C, column (3), line (b), please confirm that 0.8 percent of line (b) is 368,782. If you do not confirm, please explain.
- d. In Attachment F, column (2), line (a) and (c), are the proportions for nonmachinable Nonautomation Presort Letters (24.45%) and Automation Flats (19.95%), respectively. Please confirm that the volume of Single-Piece Letters "Nonstandard/Nonmachinable Pieces" in Attachment C, column (3) at line (e) should be  $11,351,850 (46,127,870 * 24.45\%) + (368,782 * 19.95\%)$ . If you do not confirm, please explain.

OCA/USPS-89.

- a. In the Outgoing Primary (Auto) operation, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are
- (1) First-Class letters,
  - (2) First-Class cards,
  - (3) Standard Mail letters,
  - (4) Standard Mail cards.
- b. In the 5-Digit Barcode Sort, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are
- (1) First-Class letters,
  - (2) First-Class cards,
  - (3) Standard Mail letters,
  - (4) Standard Mail cards.
- c. In the 5-digit Barcode Sort, for the MPBCS equipment, what proportion of the total letter-shaped pieces processed are

- (1) First-Class letters,
- (2) First-Class cards,
- (3) Standard Mail letters,
- (4) Standard Mail cards.

OCA/USPS-90.

- a. In the Outgoing Primary (Piece) operation, for the AFSM100 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.
- b. In the Outgoing Primary (Piece) operation, for the FSM881 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.
- c. In the Outgoing Primary (Piece) operation, for the FSM1000 Auto equipment, what proportion of the total flat-shaped pieces processed are
  - (1) First-Class flats,
  - (2) Periodicals flats,
  - (3) Standard Mail flats.

OCA/USPS-91. Please refer to page 7, lines 13 and 21, of the testimony of witness

A. Thomas Bozzo, USPS-T-14.

- a. Please define the word "plant" as used at line 13.
- b. Please provide a list of plants that meet this definition.
- c. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part b, above.
- d. Please define the word "plant" as used at line 21.
- e. Please provide a list of plants that meet this definition.
- f. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part e, above.
- g. Do witnesses Bozzo and Kingsley use the word "plant" consistently both within and between their testimonies? If not, please identify and define all other uses of the word "plant" and provide responses to parts b-c, above, for each definition.
- h. Who decides how many pieces of each type of mail processing equipment should be placed in a particular plant?
- i. Please provide copies of all instructions or other documents that explain how to determine how many pieces of each type of mail processing equipment should be placed in a plant.

OCA/USPS-92. Please refer to page 29, lines 18-26, of the testimony of witness Linda A. Kingsley, USPS-T-39. Witness Kingsley states:

Each plant must sort mail to a network of other plants, post offices, carrier routes, box sections, large firms, etc. This network is a major determinant of the plant's workload. In conjunction with the characteristics of the mail and the sorting equipment, this network determines the sort schemes that must be spread over the equipment. The work required to service the network can sometimes be distinguished from the work of processing mail volumes. This is seen most dramatically following a rate increase. Volume, and the workload required to process that volume, may

decline, but the number of separations required for the network are unaffected.

- a. Do all sort schemes utilize all possible separations on a given piece of equipment? If not, why not?
- b. Are there "marginal" separations in some sort schemes? That is, are there separations with so much or so little volume that an increase or decrease in volume for those separations would lead to creation or consolidation of separations? If not, why not?
- c. Who creates sort schemes for a particular plant?
- d. Please provide copies of all instructions or other documents that explain how to create sort schemes.
- e. Are there "marginal" stackers on some bar code sorters? That is, are there stackers with so much or so little volume that an increase or decrease in volume for those stackers would lead to one more or one less tray's being generated by those stackers for a particular run? If not, why not?
- f. Please provide copies of all instructions or other documents that explain how to sweep stackers.

OCA/USPS-93. Please refer to page 47, lines 6-8, of the testimony of witness

A. Thomas Bozzo, USPS-T-14. Witness Bozzo states:

Manual operations serve as "backstops" to automation to deal with machine rejects and machine capacity shortfalls . . . .

- a. Please define the term "backstops."
- b. Please define the term "capacity shortfalls."



- c. Does the Postal Service use manual operations to deal with machine breakdowns?
- d. Does the Postal Service use manual operations to deal with unexpectedly large volumes?
- e. How does the Postal Service meet critical dispatches when there is a "capacity shortfall"?
- f. What are the operational consequences of a failure to meet a critical dispatch?
- g. What are the consequences for managers or supervisors who fail to meet a critical dispatch?
- h. What are the financial consequences to the Postal Service of a failure to meet a critical dispatch?
- i. Please provide copies of all instructions or other documents that explain to managers or supervisors how to meet critical dispatches in the event of a "capacity shortfall" or unexpectedly large volumes.
- j. Please provide copies of all instructions or other documents that explain to managers or supervisors how to plan for a "capacity shortfall" or unexpectedly large volumes.

OCA/USPS-94. For FYs 1999, 2000, 2001, and 2002, please provide

- a. volumes by PQ and AP by plant by mail processing cost pool
- b. workhours by PQ and AP by plant by mail processing cost pool.

OCA/USPS-95. For FYs 1999, 2000, 2001, and 2002, please identify the PQs and APs that had the highest and lowest volume of

- a. cards and letter-shaped pieces
- b. flat shaped pieces
- c. nonletter/nonflat-shaped pieces.

OCA.USPS-96. For FYs 1999, 2000, 2001, and 2002, for the PQs and APs identified in the previous interrogatory, please provide the high or low volume of

- a. cards and letter-shaped pieces
- b. flat shaped pieces
- c. nonletter/nonflat-shaped pieces.

OCA/USPS-97. Former Postmaster General Henderson spoke of the desirability of the Postal Service's offering seasonal rates.

- a. Please describe all operational benefits that would accrue to the Postal Service from offering seasonal rates or discounts.
- b. Please describe all operational benefits that would accrue to the Postal Service from offering peak-load rates or discounts.
- c. Please describe all operational benefits that would accrue to the Postal Service from offering time-of-day rates or discounts.

OCA/USPS-98. Please describe how the Postal Service monitors mail on hand in plants and delivery units. Please provide copies of all instructions or other documents that describe the reporting or monitoring of mail on hand. Please provide blank copies of all forms used for or generated from the reporting or monitoring of mail on hand.

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.

/s/ h'Enri Whitseyjohnson  
h'Enri Whitseyjohnson

Washington, D.C. 20268-0001  
October 17, 2001