

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-22-26, 30(a, c) 31-50)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-22-50, filed on October 4, 2001. Interrogatory responses to OCA/USPS-27, 28 and 30(b) will be filed sperately.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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October 18, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORIES**

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.

RESPONSE:

Due to the absence of key personnel at the Postal Forum, the Postal Service has not been able to locate and assemble all of the requested documents. The Postal Service will continue to search for the requested information and will provide it when available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE

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

RESPONSE:

Both POS ONE and IRT terminals assist retail personnel in providing information and services at retail counters. As such, they essentially perform the same job. The Postal Service began using IRTs in the early 1980s, and began deploying POS ONE terminals in December 1997.

Naturally with the forward march of technology, the more recent POS ONE terminals provide additional assistance not available with the IRTs. Among the POS ONE hardware improvements are an integrated slip printer, color monitors, and enhanced scanning methods. For mailing transactions, POS ONE offers more detailed and clearer mailing service information. Most stamp and retail product sales can be captured by the POS ONE system via barcode-scanning rather than by the manual entry that is necessary when using the IRTs. Finally, POS ONE captures more transactional data than POS ONE terminals.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE:

(a) For information keyed into the retail associate's terminal, please refer to, respectively, Exhibits 1-3, "Priority Mail Workflow on Unisys IRT", "Priority Mail Workflow on IBM POS ONE System", and "Priority Mail Workflow on NCR POS ONE System".

(b) For information displayed on the retail associate's monitor, please refer to Exhibits 1-3.

(c) Screen prints of IBM and NCR POS ONE screens are being provided in hard copy as Exhibits 4 and 5, respectively. Screen prints are not available from the Unisys IRTs, but a sample Priority Mail screen obtained from a software document is being provided as Exhibit 6.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 1: PRIORITY MAIL WORKFLOW ON UNISYS IRT

Employee Input into IRT	Resulting Info Display
Employee selects <PRIOR BY WEIGHT> or <PRIOR FLAT RATE> key. (Work flow is identical for the two selections.)	List of available special services.
Employee keys in destination ZIP Code.	Postage rate and list of available special services. If destination has 3-day service standard, "3-Day Service Area; Advise Customer" message appears.
<i>This step is skipped if customer does not want to purchase any special services.</i> Employee selects the appropriate special service key(s).	Postage rate and list of available special services remain visible. "3-Day Service Area" message (if present) disappears during entry of special service values and scanning of Delivery/Signature Confirmation barcodes.
<i>This step is skipped if employee does not select <Delivery Confirmation> or <Signature Confirmation>.</i> Employee keys in number of appropriate menu selection: 1. Delivery Confirmation 2. Signature Confirmation	Same as above, with fees shown for any selected non-value-dependent special services.
<i>This step is skipped if employee does not select <Delivery Confirmation> or <Signature Confirmation>.</i> Employee scans the barcoded Delivery Confirmation or Signature Confirmation label number or keys it in.	Same as above.
<i>This step is skipped if employee does not select <Register>, <Insure>, or <COD>.</i> <ul style="list-style-type: none"> • For registered mail employee keys in article value. • For insured mail employee keys in amount of insurance. • For COD employee keys in insurance amount or COD amount, whichever is higher. 	Fees for registered, insured, or COD service included in postage and fee display. "3-Day Service Area" message returns to screen if it applies.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 1: PRIORITY MAIL WORKFLOW ON UNISYS IRT (Continued)

Employee Input into IRT	Resulting Info Display
Employee selects <PVI> key to sell PVI label for postage, <POSTAGE STAMPS> key to sell stamps as postage, or <RESET> key if customer already has sufficient postage on the item (customer meter strip or previously-purchased stamps).	Transaction complete; all information disappears from screen except total amount customer owes for mailing.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 2: PRIORITY MAIL WORKFLOW ON IBM POS ONE SYSTEM

Employee Input into IBM POS ONE Terminal	Resulting Info Display
Employee selects <Priority Mail> button.	
Employee keys in destination ZIP Code.	City and state for ZIP Code entered, plus list of special services available for selection and the fees for those that are not value-dependent.
<ul style="list-style-type: none"> • If customer does not want to purchase any special services, employee selects <Done> button. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Employee selects button(s) indicating desired special service(s), followed by <Done> button. 	Depends on employee selection: Postage rate and special service options not shown on value-input and barcode-scanning screens (most services require one or the other).
<p style="text-align: center;"><i>This step is skipped if employee does not select <Delivery Confirmation> or <Signature Confirmation>.</i></p> <p>Employee scans barcoded label number or keys it in.</p>	List of available special services and their fees (if not value-dependent), with already-selected services highlighted and exact fees shown. Postage rate also shown.
<p style="text-align: center;"><i>This step is skipped if employee does not select <Registered Mail> or <Insurance> or <COD>.</i></p> <ul style="list-style-type: none"> • For <Registered Mail> employee enters the article value. • For <Insurance> employee enters the insurance amount. • For <COD> employee enters the insurance amount or the COD amount, whichever is higher. 	List of available special services and their fees (if not value-dependent), with already-selected services highlighted and exact fees shown. Postage rate also shown.
Employee selects <Done> button to indicate that all desired special services have been selected.	Mailing – Summary screen appears, showing probable date of arrival (including day and date).
<p>Depending upon type of postage being used, employee selects appropriate button:</p> <p style="padding-left: 20px;"><Done> *</p> <p style="padding-left: 20px;"><Sell Stamps></p> <p style="padding-left: 20px;"><Postage Affixed>**</p> <p>* Prints PVI label.</p> <p>** Used if customer has all or part of postage already affixed to article.</p>	Rate, fee, and probable date of arrival disappear from screen. Total postage owed by customer is shown.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 2: PRIORITY MAIL WORKFLOW ON IBM POS ONE SYSTEM
(Continued)

Employee Input into IBM POS ONE Terminal	Resulting Info Display
<p><i>This step is skipped if employee has not previously selected <Registered Mail> <Insurance>, <Certified Mail> or <Rtn Receipt (Merch)>.</i></p> <p>Employee inserts insured or registered receipt in slip printer for completion.</p>	<p>Transaction complete.</p>

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 3: PRIORITY MAIL WORKFLOW ON NCR POS ONE SYSTEM

Employee Input into NCR POS ONE Terminal	Resulting Info Display
Employee keys in destination ZIP Code.	City and state matching the entered ZIP Code.
Employee selects <Priority Mail> key.	Priority Mail options, their postage rates, and one of the following service standards for each of the two Priority Mail options: <ul style="list-style-type: none"> • 1 Day • 2 Days • 3 Days • No Service Standard * * Displayed for APO/FPO ZIP Codes.
Employee selects either <Priority Mail> key or <Priority Mail Flat Rate> key. (Ensuing work flows and service standards are identical for the two choices.)	Special services available for selection and their fees. Postage rate and service standard information not visible.
<ul style="list-style-type: none"> • If customer does not want to purchase any special services, employee selects <Continue> key. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Employee selects key(s) indicating desired special service(s), followed by <Continue> key. 	No rate, fee or service standard information visible during special service selection.
<p><i>This step is skipped if employee does not select <Registered>, <Insured> or <COD>.</i></p> <ul style="list-style-type: none"> • For <Registered> employee enters value. • For <Insured> employee enters insurance amount. • For <COD> employee enters article value and COD amount. 	Same as above.
<ul style="list-style-type: none"> • If customer does not want to purchase return receipt or restricted delivery, employee selects <Continue> key. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Employee selects key(s) indicating desired service(s), followed by <Continue> key. 	Same as above.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
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EXHIBIT 3: PRIORITY MAIL WORKFLOW ON NCR POS ONE SYSTEM
(Continued)

Employee Input into NCR POS ONE Terminal	Resulting Info Display
<p><i>This step is skipped if employee does not select a special service requiring a numbered form.</i></p> <p>Employee scans barcoded special service label number or keys it in. For some services, employee may also insert the special service form in the slip printer for completion by the system.</p>	<p>Postage rate, selected services, and their fees.</p>
<p>Depending upon type of postage to be used, employee selects appropriate key:</p> <ul style="list-style-type: none"><Print PVI><Issue Stamps><No Postage Required> *<Postage Affixed> ** <p>* For customers using previously purchased stamps or customer meter strips.</p> <p>** For customer with part of postage already affixed.</p>	<p>Same as above.</p> <p>Mailing transaction is complete.</p>

FIRST CLASS - PRIORITY MAIL

SELECT SPECIAL SERVICES IF REQUIRED

1-DAY SERVICE AREA, ADVISE CUSTOMER

SAT FEB 10, 2001 14:54

BASE RATE 3.50
DEL/SIG CONFIRM
INSURANCE DECS
CERTIFIED
REGISTERED DECS
C.O.D. DECS
RETURN RECEIPT
RESTRICTED DEL
SPCL HANDLING
OVERSIZE/SURCHG
MISC. POSTAGE
ALPHA-F POSTNET-FLAT
OFF
ALPHA-Z DESTINATION ZIP LABEL

MANUAL WEIGHT

1 0.0

POUNDS

OUNCES

ZONE 8

99999

ZIP CODE

\$ 3.50

TOTAL CHARGES

Sample Domestic Mail Transaction Screen

EXHIBIT 6 (OCA/USPS-34)

10/16/01 12:34

User: 0000/INSTALLER

Workstation: sys5001

Item Entry
Store: USPS

Qty	Description	Unit	Total
	Dom. Express Mail PO to Addressee		
	Priority Mail with Delivery Confirmation		
	Priority Mail 2 lb. Flat Rate (\$3.95)		
	1st Class or Priority / Cert. w/ Rtn Receipt		
	Global EMS		
	Int'l Air Letter-post		
	Int'l Economy Parcel Post with Insurance		
	Int'l Air Parcel Post with Insurance		
	Priority Mail with Signature Confirmation		
	Priority Mail with Insurance		
	Parcel Post with Insurance		
	Parcel Post		
	1st Class Stamp		
	21c Stamped Card @ 23c		
	1st Class Stamped Envelope		
	20c Stamped Card @ 22c		
	Priority Mail		
	Int'l Air Parcel Post		
	1st Class Priority Mail		
	1st Class Stamp		

Total:

Help

Lock

Quit

Tasks

Sales	Mailing
Customer Svcs	Money Order
Exp Mail Cutoff	Read Scale
Key Item Code	Misc GLA Entry
Info Lookup	Mail Pickup
Cash for Stamps	Non-Retn Pickup

Done

Mailing Obtain Destination

Weight: 0.00oz Destination: Services: <SERVICES>
Class: <CLASS>

What is destination of mail package?

ZIP Code:

ZIP Code:

- Flat Article
- Lookup Address
- International

ZIP Code:

7	8	9	Delete
4	5	6	Back
1	2	3	Clear
	0	Enter	
	<	>	

Done

Tasks

Quit

Lock

Help

Mailing - Service Selection

Weight: 6.20oz

Destination: ATLANTA, GA 30310 Zone: 4

Total: \$3.50

Class: Priority Mail

Services:

Primary Services

Dependent Services

Service	Fee
Certificate of Mailing	0.75
Certified Mail	2.10
COD	0.00
Insurance	0.00
Registered Mail	0.00
Rtn Receipt (Merch.)	2.35
Special Handling	5.40
Delivery Confirmation	0.40
Signature Confirmation	1.75

Service	Fee
Unavailable Services	
Restricted Delivery	3.20
Return Receipt	1.50

Help

Lock

Quit

Tasks

Done

Mailing - Services Information for Insurance

Weight: 5.20oz **Destination:** ATLANTA, GA 30310 Zone: 4
Class: Priority Mail **Services:**

Enter the dollar amount of insurance required for article. The value cannot be greater than the article value. The amount must be at least \$0.01 and no more than \$5000.00.

Insurance/Indemnity:

Insurance/Indemnity:

0.00

	7	8	9	Delete
ABC...	4	5	6	Back
	1	2	3	Clear
		0	Enter	
	<	>		

Help

Lock

Quit

Tasks

Cancel

Done

Mailing - Service Selection

Total: \$8.50

Weight: 6.20oz Destination: ATLANTA, GA 30318 Zone: 4

Class: Priority Mail Services: Insurance

Dependent Services

Primary Services

Service	Fee	Service	Fee
Insurance	5.00	Restricted Delivery	3.20
Special Handling	5.40	Return Receipt	1.50
Delivery Confirmation	0.40	Unavailable Services	
Signature Confirmation	1.75	Certificate of Mailing	0.75
		Certified Mail	2.10

Help Lock Quit Tasks Done

Mailing - Summary

Your **6.20oz** package will be delivered by

Priority Mail

to **ATLANTA, GA 30310 Zone: 4** at a cost of **\$8.50**

The probable date of arrival is: Thursday, October 18, 2001

Other Information

The following services/surcharges have been requested:

View Forms	Postage Affixed
Sell Stamps	Enclosed Letter
Add/Remove Surcharges	

Service:	Insurance
Value:	\$350.00
Cost:	\$5.00

Priority Mail:	\$3.50
Cost of Services:	\$5.00
Surcharges:	\$0.00
Postage Affixed:	\$0.00
Total:	\$8.50

Help	Lock	Quit	Tasks	Done
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Qty	Description	Unit	Total
1	9262 Priority Mail	8.50	8.50
Destination: 30310			

Dom. Express Mail PO to Addressee

1st Class or Priority / Cert. w/ Rtn Receipt

Global EMS

Int'l Air Letter-post

Int'l Economy Parcel Post

Priority Mail with Delivery Message

Priority Mail 2 lb. Flat Rate

Priority Mail with Insurance

Int'l Economy Parcel Post with Insurance


Priority Mail

20c Stamped Card @ 22c

Cancel

OK

Cancel

 Insert the front of Form 3813P document in the document insert station for printing.

Mailing

Sales

Money Order

Read Scale

Misc GLA Entry

Mail Pickup

Cash for Stamps

Non-Rev Pickup

Total:

Help

Lock

Quit

Tasks

Done

Item Entry

Transaction: 3

Store: USPS

User: 0000/INSTALLER

Workstation: sys5001

10/16/01

1241

Qty	Description	Unit	Total
1	9262 Priority Mail Destination: 30310 Weight: 6.20oz Insurance 5.00 PVI Label Amount: 8.50	8.50	8.50

SubTotal: 8.50

Tax: 0.00

Total: 8.50

Navigation icons: Home, Back, Forward, Stop, Refresh, Print, etc.

Function buttons: Sales, Mailing, Customer Svcs, Money Order, Exp Mail Cutoff, Read Scale, Key Item Code, Misc GLA Entry, Info Lookup, Mail Pickup, Cash for Stamps, Non-Play Pickup

Help

Lock

Quit

Tasks

Done



Domestic Mail

4:09 PM Mon, Oct 15, 2001 - 9.00.035.002

Enter / confirm ZIP Code or select a dynakey.

For Flat Articles, add 4 digits.

Off lbs.	Off oz.	<input type="checkbox"/>
----------	---------	--------------------------

	0.00oz	\$0.00
	Subtotal	\$0.00

Total:
\$0.00

- Single Stamp Sale 
- Sell Domestic Money Order with Fee 
- International Mail 
- Zero Scale 
- Standby 
- Sell by Item Number 



Domestic Mail

4:10 PM Mon, Oct 15, 2001 - 9.00.035.002

What are you mailing?

Toggle on/off <Surcharges> if applicable.
For Express Mail, scan the barcode label.

0 lbs. 6.90 oz.

JACKSONVILLE FL 32216

6.90oz

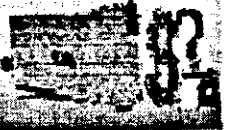
\$0.00

Subtotal

\$0.00

Total:
\$0.00

Letter/ Correspondence



Package/ Merchandise



Flat



Priority Mail



Express Mail



Certified Mail w/ Return Receipt



Priority Mail w/ Insurance



Surcharges



Domestic Mail

4:10 PM Mon, Oct 15, 2001 - 9.00.035.002

Select mail class:

Press [Help] to view size restrictions.

0 lbs. 6.90 oz.

1. Priority Mail	2 Days	\$3.50
2. Priority Mail Flat Rate	2 Days	\$3.95

Total:
\$0.00

Priority Mail



Priority Mail Flat Rate



Domestic Mail

4:10 PM Mon, Oct 15, 2001 - 9.00.035.002

Select special service and/or

<Continue...>:

Do you want insurance? Select <Continue...> when done.

0 lbs. 6.90 oz.

1

1.	Certified	\$2.10
2.	Registered(\$25000.00 max indemnity if insured)	\$7.25
3.	Insured(up to \$5000.00 or up to \$50.00 if Return Receipt for Merchandise is selected)	\$1.10
4.	Delivery Confirmation	\$0.40
5.	Signature Confirmation	\$1.75
6.	COD(up to \$1000.00)	\$4.50
7.	Return Receipt for Merchandise	\$2.35
8.	Special Handling	\$5.40

Certified

Registered

Insured

Delivery Confirmation

Signature Confirmation

COD

Return Receipt for Merchandise

Continue To Finish



Domestic Mail

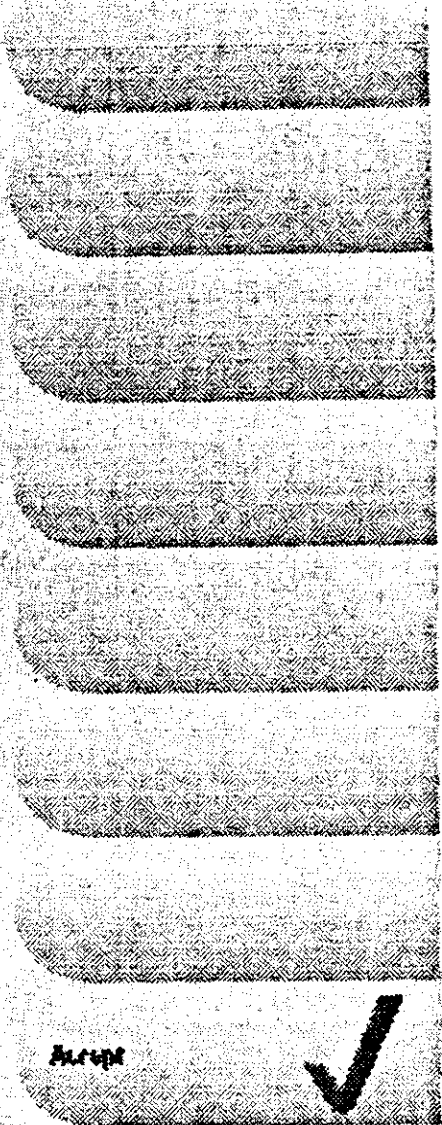
4:11 PM Mon, Oct 15, 2001 - 9.00.035.002

Enter Insurance Amount :

0 lbs.	6.90 oz.	\$	0.00
--------	----------	----	------



Insurance Amount :	\$0.00



Accept



Domestic Mail

4:11 PM Mon, Oct 15, 2001 - 9.00.035.002

Select an option:

Do you want Return Receipt or Restricted Delivery?

Select <Continue> when done.

0 lbs. 6.90 oz.

1

Return Receipt

Restricted Delivery

Waive Return Receipt for Merchandise Signature

1	Return Receipt	\$1.50
2	Restricted Delivery	\$3.20
	Waive Return Receipt for Merchandise Signature	\$0.00

Continue





Domestic Mail

4:11 PM Mon, Oct 15, 2001 - 9.00.035.002

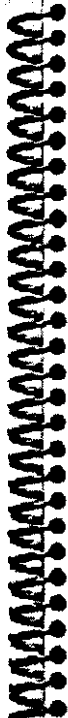
Scan / enter PS Form 3813-P label number.

To print PS Form 3813-P, insert form, then select a dynakey.

Print PS Form



0 lbs. 6.90 oz.



PS Form 3813-P Label #:

Multiple horizontal lines for entering the PS Form 3813-P label number.

Accept



Domestic Mail

4:15 PM Mon, Oct 15, 2001 - 9.00.035.002

What kind of postage?

To make changes,
select <Change ...> dynakey.

0 lbs. 6.90 oz.

1

JACKSONVILLE, FL 32216 Priority 6.90oz \$3.50
Mail
Insured \$4.00
Insurance Amount \$250.00
Label Serial Number V600436256US
Subtotal \$7.50

Print PTT



Issue Stamp



No Postage
Required



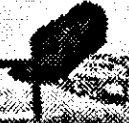
Paying by
Account



Postage Affixed



Certificate of
Mailing



Add/Change
Services



Change ZIP /
Class /
Surcharges



Domestic Mail

4:16 PM Mon, Oct 15, 2001 - 9.00.035.002

**Enter / confirm ZIP Code
or select a dynakey.**

For Flat Articles, add 4 digits.

Single Stamp
Sale



Sell Domestic
Money Order
with Fee



International
Mail



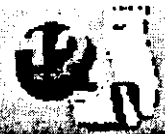
Zero Scale



Standby



Sell by Item
Number



Off lbs. Off oz.

JACKSONVILLE FL 32216 Priority	6.90oz.	\$3.50
Mail		
Insured		\$4.00
Insurance Amount :	\$250.00	
Label Serial Number :	VV600436256US	
Issue PVI:		\$7.50
	0.00oz.	\$0.00
Subtotal:		\$0.00

**Total:
\$7.50**

FIRST CLASS - PRIORITY MAIL

SELECT SPECIAL SERVICES IF REQUIRED

3 DAY SERVICE AREA, ADVISE CUSTOMER

SAT FEB 10, 2001 14:54

BASE RATE 3.50
DEL/SIG CONFIRM
INSURANCE DECS
CERTIFIED
REGISTERED DECS
C.O.D. DECS
RETURN RECEIPT
RESTRICTED DEL
SPCL HANDLING
OVERSIZE/SURCHG
MISC. POSTAGE
ALPHA-F POSTNET-FLAT
OFF
ALPHA-Z DESTINATION ZIP LABEL

MANUAL WEIGHT

1 0.0

POUNDS

OUNCES

ZONE 8

99999

ZIP CODE

\$ 3.50

TOTAL CHARGES

Sample Domestic Mail Transaction Screen

SAMPLE UNISYS IRT PRIORITY MAIL SCREEN

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE:

(a) For information keyed into the retail associate's terminal, please refer to, respectively, Exhibits 1-3, "Domestic Express Mail Workflow on Unisys IRT", "Domestic Express Mail Workflow on IBM POS ONE System", and "Domestic Express Mail Workflow on NCR POS ONE System".

(b) For information displayed on the retail associate's monitor, please refer to Exhibits 1-3.

(c) Screen prints of IBM and NCR POS ONE screens are being provided in hard copy as Exhibits 4 and 5, respectively. Screen prints are not available from the Unisys IRTs, but a sample Express Mail screen from a software document is being provided as Exhibit 6.

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(d) Both IRTs and POS ONE systems provide limited information about some situations in which the regular Express Mail commitment is not likely to be achieved. First, for articles sent to overnight destinations after the retail unit's cut-off time, all systems display a two-day delivery commitment. This is not a case of the service commitment's not being met; the service commitment is based on receipt of the mailpiece no later than the cut-off time. The service commitment changes if the mailpiece is accepted after the cut-off time. Because of the current network database structure, articles sent to two-day destinations after the cut-off time display a two-day commitment.

Second, the NCR POS ONE system displays a warning message for articles addressed to post office boxes that are scheduled for delivery over the weekend: "Service commitment will be effective only if Post Office Box accessible on the weekend." None of the systems contain data identifying the specific destinations where post office boxes are inaccessible on weekends or where Express Mail street delivery is not made on weekends and holidays.

(e) Retail associates are trained to advise the customer of the delivery guarantee and record it on the Express Mail label. See the response to part (d).

(f) See USPS-LR-J-144.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

Exhibit 1: DOMESTIC EXPRESS MAIL WORKFLOW ON UNISYS IRT

Employee Input Into IRT	Resulting Info Display
Employee selects <EXPRESS PO-ADD> or <EXPRESS PO-PO> key, depending on type of Express Mail Service desired.	List of available special services.
Employee keys in destination ZIP Code.	Postage rate, list of available special services, and one of following service commitments: <ul style="list-style-type: none"> • AM SERVICE AVAILABLE • PM SERVICE AVAILABLE • 2ND DAY AM SERVICE AVAILABLE • 2ND DAY SERVICE AVAILABLE
Employee scans barcoded Express Mail label number or keys it in.	Same as above.
<p><i>This step is skipped if customer does not Want to purchase any special services.</i></p> <p>If customer wants to purchase additional insurance, employee selects <INSURE> key and keys in total amount of insurance desired.</p> <p>If customer wants to purchase collect-on-delivery (COD) service, employee selects <COD> key and keys in amount to be collected or amount of insurance desired, whichever is higher.</p> <p>If customer wants to purchase a return receipt, employee selects RET RECPT key.</p>	Same as above, plus fees for any special services selected.
<p>Depending upon how customer will pay for postage, employee selects from menu by keying in number of appropriate menu item:</p> <ol style="list-style-type: none"> 1. Corporate Account 2. Federal Agency 3. Other * <p>* For all non-account transactions.</p>	Same as above.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

Exhibit 1: DOMESTIC EXPRESS MAIL WORKFLOW ON UNISYS IRT (Continued)

Employee Input into IRT	Resulting Info Display
<p align="center"><i>This step is skipped if employee selected #3, Other.</i></p> <p>After selection of #1 (Corporate Account, employee enters 6-digit EMCA number, whereupon IRT prompts for optional chargeback code. Employee enters chargeback code shown on Express Mail label, if any.</p> <p>After selection of #2 (Federal Agency), employee enters 3-digit agency number, whereupon IRT prompts for optional sub-control number. Employee enters sub-control number on Express Mail label, if any.</p>	<p>Same as above.</p>
<p align="center"><i>This step is skipped for PO-PO items.</i></p> <p>Based on mailer's desire for weekend/holiday delivery, employee selects delivery option from menu by keying in number of appropriate menu item:</p> <ol style="list-style-type: none"> 1. Normal Express Mail Delivery 2. No Weekend Delivery 3. No Holiday Delivery 4. No Weekend and Holiday Delivery 	<p>Same as above, plus delivery option</p> <p>(Selection of #2, #3, or #4 does not alter the service commitment display, nor does it alter the commitment the employee records on the label.)</p>
<p align="center"><i>This step is skipped for PO-PO items.</i></p> <p>IRT prompts employee to indicate whether item is addressed to a post office box, and employee keys in number of appropriate menu selection:</p> <ol style="list-style-type: none"> 1. Yes 2. No 	<p>Same as above.</p>
<p>Employee selects the <ENTER> key to save the transaction data.</p>	<p>Same as above.</p>
<p>Employee selects <PVI> key to sell PVI label for postage, <POSTAGE STAMPS> key to sell stamps as postage, or <RESET> key if customer is paying via corporate account or federal agency number or already has sufficient postage on the item (customer meter strip or previously-purchased stamps).</p>	<p>Mailing transaction complete. All information disappears from screen except the total cost of the mailing.</p>

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

Exhibit 2: DOMESTIC EXPRESS MAIL WORKFLOW ON IBM POS ONE SYSTEM

Employee Input into IBM POS ONE Terminal	Resulting Info Display
Employee selects <Dom. Express Mail PO to Addressee> button. (A somewhat longer workflow is necessary for initial selection of Post Office-to-Post Office service.)	
Employee keys in destination ZIP Code.	City and state for ZIP Code entered, plus the date of expected delivery and one of the following commitments: <ul style="list-style-type: none"> • Next Day AM • Next Day PM • 2nd Day AM • 2nd Day PM
Employee scans barcoded Express Mail label number or keys it in.	Same as above, plus postage rate (no longer covered up by large input keypad).
<i>This step is skipped for PO-PO items.</i> Employee selects from picklist to indicate whether destination is a PO Box: <No> <Yes>	Same as above.
Depending upon type of postage to be used, employee selects from picklist: <Other> * <Corporate Account> <Federal Agency> * For all non-account transactions.	Commitment info still displayed; postage rate covered up by input keypad if either <Corporate Account> or <Federal Agency> selected.
<i>This step skipped if employee selects <Other> button.</i> • For corporate account payments, employee enters 6-digit EMCA number, and optional chargeback code if latter is present on Express Mail label. • For federal agency payments, employee enters 3-digit agency number, and optional sub-control number if latter is present on Express Mail label.	Postage rate visible again; commitment info still displayed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

**EXHIBIT 2: DOMESTIC EXPRESS MAIL WORKFLOW ON IBM POS ONE SYSTEM
(Continued)**

Employee Input into IBM POS ONE Terminal	Resulting Info Display
<p><i>This step is skipped for PO-PO items.</i></p> <p>Based on mailer's desire for weekend/holiday delivery, employee selects from picklist:</p> <p style="padding-left: 40px;"> <Normal Express Mail> [default selection] <No Weekend Delivery> <No Holiday Delivery> <No Weekend or Holiday Delivery> </p>	<p>List of available special services and fees for non-value-dependent services. Postage rate still visible, but commitment info temporarily disappears.</p>
<ul style="list-style-type: none"> • If customer does not want to purchase any special services, employee selects <Done> button. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Employee selects button(s) indicating desired special service(s): <p style="padding-left: 40px;"> <COD> <Insurance (Merch.)> <Return Receipt> </p> <p>Employee then selects <Done> button.</p>	<p>Postage rate, service commitment, and special service options not visible on special service value-input screen.</p>
<p><i>This step is skipped if employee selected neither <Insurance (Merch.)> nor <COD>.</i></p> <ul style="list-style-type: none"> • For insurance employee enters the insurance amount. • For COD employee enters the insurance amount or the COD amount, whichever is higher. 	<p>List of available special services and their fees (if not value-dependent), with already-selected services highlighted and exact fees shown. Postage rate visible, but not service commitment.</p>
<p>Employee selects <Done> button to indicate that all desired special services have been selected.</p>	<p>Mailing – Summary screen appears, showing same commitment info as before (including day and date), but in a different position on the screen. Postage rate and selected special services (with fees) also shown.</p>

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 2: DOMESTIC EXPRESS MAIL WORKFLOW ON IBM POS ONE SYSTEM
(Continued)

Employee Input into IBM POS ONE Terminal	Resulting Info Display
<p>Depending upon type of postage being used, employee selects appropriate button:</p> <ul style="list-style-type: none">• For corporate account mailings employee selects <Done>.• For non-account mailings employees selects appropriate button from among the following:<ul style="list-style-type: none"><Done> *<Sell Stamps><Postage Affixed>** <p>* Prints PVI label.</p> <p>** Used if customer has all or part of postage already affixed to article.</p>	<p>Mailing transaction complete; commitment info disappears. Screen shows fees for any special services selected and total amount of payment due for the transaction (\$0.00 for account mailings).</p>

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

EXHIBIT 3: DOMESTIC EXPRESS MAIL WORKFLOW ON NCR POS ONE SYSTEM

Employee Input into NCR POS ONE Terminal	Resulting Info Display
Employee keys in destination ZIP Code.	City and state matching the entered ZIP Code.
Employee selects <Express Mail> key.	<p>Types of Express Mail service available to the destination, their postage rates, and one of the following commitments for each type of Express Mail:</p> <p>Post Office-Addressee</p> <ul style="list-style-type: none"> • Nextday Noon • Nextday 3PM • 2ND Day Noon • 2nd Day 3PM <p>Post Office-Post Office</p> <ul style="list-style-type: none"> • Nextday 10AM • 2nd Day 10AM
Employee selects <Express Mail PO-Addressee> or <Express Mail PO-PO> key, depending on type of Express Mail Service desired.	Postage rate and appropriate commitment, as shown above, for the specific type of Express Mail service selected.
<p><i>This step is skipped for PO-PO items.</i></p> <p>Based on mailer's desire for weekend/holiday delivery, employee selects appropriate delivery option key from among these options:</p> <ul style="list-style-type: none"> <Normal> <No Weekend> <No Holiday> <No Weekend or Holiday> 	Same as above, plus the selected delivery option. The commitment itself is not altered.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

**EXHIBIT 3: DOMESTIC EXPRESS MAIL WORKFLOW ON NCR POS ONE SYSTEM
(Continued)**

Employee Input into NCR POS ONE Terminal	Resulting Info Display
<p style="text-align: center;"><i>This step is skipped for PO-PO items.</i></p> <p>Employee selects appropriate key to indicate the type of delivery address:</p> <p style="padding-left: 40px;"><Street Address> <P. O. Box></p>	<p>Same as above, plus list of available special services and their fees.</p> <p>In addition, if employee selects "P. O. Box" and the expected delivery date falls on the weekend, the following pop-up message covers much of the screen:</p> <p style="padding-left: 20px;">"Service commitment will be effective only if Post Office Box accessible on the weekend."</p> <p>The employee must select the "Continue" key to dismiss the message.</p>
<ul style="list-style-type: none"> • If customer does not want to purchase any special services, employee selects <Continue> key. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • Employee selects key(s) indicating desired special service(s): <p style="padding-left: 40px;"><Insured> <COD> <Return Receipt></p> <p>Employee then selects <Continue> key.</p>	<p>Postage rate and service commitment info disappears temporarily during special service selection.</p>
<p style="text-align: center;"><i>This step is skipped if employee selects neither <Insured> nor <COD>.</i></p> <ul style="list-style-type: none"> • For <Insured> employee enters insurance amount. • For <COD> employee enters article value and COD amount. 	
<p style="text-align: center;"><i>This step is skipped if employee does not select <COD>.</i></p> <p>Employee scans barcoded COD label number or keys it in.</p>	<p>Postage rate, fees for selected special services, and commitment information.</p>

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE

**EXHIBIT 3: DOMESTIC EXPRESS MAIL WORKFLOW ON NCR POS ONE SYSTEM
(Continued)**

Employee Input into NCR POS ONE Terminal	Resulting Info Display
Employee scans barcoded Express Mail label number or keys it in.	Same as above.
<p>Depending upon type of postage to be used, employee selects appropriate key:</p> <ul style="list-style-type: none"> <Print PVI> <Issue Stamps> <No Postage Required> * <Paying by Account> <Postage Affixed> ** <p>* For customers using previously purchased stamps or customer meter strips.</p> <p>** For customer with part of postage already affixed.</p>	Same as above.
<p><i>This step is skipped unless employee selects <Paying by Account>.</i></p> <p>Employee selects appropriate key:</p> <ul style="list-style-type: none"> <Corporate Account> <Federal Agency Account> 	Rate, fee, and commitment info disappears during account entry.
<p><i>This step is skipped unless employee selects <Paying by Account>.</i></p> <p>For corporate account payments, employee enters 6-digit EMCA number, followed by optional chargeback code if latter is present on Express Mail label.</p> <p>For federal agency payments, employee enters 3-digit agency number, followed by optional sub-control number if latter is present on Express Mail label.</p>	<p>Rate, fee, and commitment info returns to the screen.</p> <p>(Mailing transaction is complete.)</p>

12:25

10/16/01

User: 0000\INSTALLER

Workstation: sys5001

Item Entry

Store: USPS

Qty Description Unit Total

Dom. Express Mail PO to Addressee	Priority Mail with Delivery Confirmation	Priority Mail 2 lb. Flat Rate (\$3.95)	1st Class } Priority Mail
1st Class or Priority / Cert. w/ Rtn Receipt	Parcel Post with Insurance	Parcel Post	1st Class Stamp
Global EMS	Priority Mail with Signature Confirmation	Priority Mail with Insurance	21c Stamped Card @ 23c
Int'l Air Letter-post	Int'l Air Parcel Post with Insurance	Int'l Air Parcel Post	1st Class Stamped Envelope
Int'l Economy Parcel Post	Int'l Economy Parcel Post with Insurance	Priority Mail	20c Stamped Card @ 22c

Total:

Help

Lock

Quit

Tasks

Sales	Mailing
Customer Svcs	Money Order
Exp Mail Cutoff	Read Scale
Key Item Code	Misc GLA Entry
Info Lookup	Mail Pickup
Cash for Stamps	Non-Rev Pickup

Done

Mailings - Obtain Destination

Weight: 0.00oz Destination: Services: <SERVICES>
Class: <CLASS>

What is destination of mail package?

ZIP Code: [- -]

ZIP Code:

Flat Article

Lookup Address

International

ZIP Code: [- -]

7	8	9	Delete
ABC...	4	5	Back
	1	2	Clear
		0	Enter
	<-	->	

Done

Tasks

Quit

Lock

Help

Mailing - Data for Express Mail PO-Addressee

Weight: 5.20oz **Destination:** LITTLE ROCK, AR 72201 **Zone:** 3
Class: Exp. Mail PO-ADD **Services:**

Label Number:

Destination is PO Box?:

Payment Method:

Delivery Option:

Date - Time In: 10/16/2001 - 12:12
Relative Delivery Date: 2nd Day PM
Absolute Delivery Date: 10/18/2001 PM
Cutoff: 00:01

Label Number:

	7	8	9	Delete
ABC	4	5	6	Back
	1	2	3	Clear
		0	Enter	
	<-	->		

Help **Lock** **Quit** **Tasks** **Done**

EXHIBIT 4, p. 3

Mailing - Data for Express Mail PO-Addressee

Weight: 6.20oz

Destination: LITTLE ROCK, AR 72201 Zone: 3

Total: \$12.45

Class: Exp. Mail PO-ADD

Services:

Label Number:

B12345677

Destination is PO Box?:

Payment Method:

Delivery Option:

Normal Express Mail

Date - Time In: 10/16/2001 - 12:12

Relative Delivery Date: 2nd Day PM

Absolute Delivery Date: 10/18/2001 PM

Cutoff: 00:01

Is destination address a PO Box?

NO

YES

Help

Lock

Quit

Tasks

Done

Mailing - Data for Express Mail PO-Addressee

Weight: 6.20oz

Destination: LITTLE ROCK, AR 72201 Zone: 3

Total: \$12.45

Class: Exp. Mail PO-ADD

Services:

Label Number:

B12345677

Destination is PO Box?:

NO

Payment Method:

[Empty text box]

What payment method?

Other

Corporate Account

Federal Agency

Delivery Option:

Normal Express Mail

Date - Time In: 10/16/2001 - 12:12

Relative Delivery Date: 2nd Day PM

Absolute Delivery Date: 10/18/2001 PM

Cutoff: 00:01

Help

Lock

Quit

Tasks

Done

Weight: 5.20oz Destination: LITTLE ROCK, AR 72201 Zone: 3
Class: Exp. Mail PO-ADD Services:

Label Number: **B12345677**

Destination is PO Box?: **NO**

Payment Method: **Federal Agency**

Control - Sub: **-**

Control Number:

Federal Agency Name:

Delivery Option: **Normal Express Mail**

Date - Time In: 10/16/2001 - 12:12
Relative Delivery Date: 2nd Day PM
Absolute Delivery Date: 10/18/2001 PM
Cutoff: 00:01

Control - Sub			-
7	8	9	Delete
4	5	6	Back
1	2	3	Clear
ABC			0
		←	→
Enter			

Buttons: Help, Lock, Quit, Tasks, Done

Mailing - Data for Express Mail PO-Addressee

Weight: 5.20oz Destination: LITTLE ROCK, AR 72201 Zone: 3 Total: \$12.45
Class: Exp. Mail PO-ADD Services:

Label Number: **B12345677**

Destination is PO Box?: **NO**

Payment Method: **Federal Agency**

Control - Sub Control Number: **401-12345**

Federal Agency Name: US Postal Svc

Delivery Option: **Normal Express Mail**

Date - Time In: 10/16/2001 - 12:12
Relative Delivery Date: 2nd Day PM
Absolute Delivery Date: 10/18/2001 PM
Cutoff: 00:01

What delivery options?

Normal Express Mail ▲
No Weekend Deliv
No Holiday Delive ▼
◀ | | ▶

Help

Lock

Quit

Tasks

Done

Mailing - Service Selection

Weight: 6.20oz Destination: LITTLE ROCK, AR 72201 Zone: 3 Total: \$12.45
Class: Exp. Mail PO-ADD Services:

Dependent Services

Primary Services

Service	Fee	Service	Fee
COD	0.00		
Insurance (Merch.)	0.00		
Return Receipt	1.50		

Unavailable Services

Navigation and Action Buttons:

- Help
- Lock
- Quit
- Tasks
- Done

Weight: 6.20oz Destination: LITTLE ROCK, AR 72201 Zone: 3
Class: Exp. Mail PO-ADD Services:

Enter the dollar amount of insurance required for article. The value cannot be greater than the article value. The amount must be at least \$500.01 and no more than \$5000.00.

Insurance/Indemnity: 0.00

Insurance/Indemnity: 0.00

7	8	9	Delete
ABC...	4	5	6
	1	2	3
	.	0	Enter
	<-	->	

- Help
- Lock
- Quit
- Tasks
- Cancel
- Done

Mailing - Service Selection

Weight: 6.20oz

Destination: LITTLE ROCK, AR 72201 Zone: 3

Total: \$14.45

Class: Exp. Mail PO-ADD

Services: Insurance (Merch.)

Primary Services

Dependent Services

Service

Fee

Service

Fee

Insurance (Merch.)

2.00

Return Receipt

1.50

Unavailable Services

COD

0.00

Help

Lock

Quit

Tasks

Done

Mailing - Summary

Your **6.20oz** package will be delivered by

Express Mail PO-Addressee

to **NEW YORK, NY 10020 Zone: 6** at a cost of **\$12.45**

Guaranteed delivery: Wednesday AM, 10/17/01 Normal Express Mail Delivery. Date - Time In: 10/16/01 - 12:26

Other Information

The following services/surcharges have been requested.

View Forms Postage Affixed
Sell Stamps Enclosed Letter
Add/Remove Surcharges

Express Mail PO-Addressee:	\$12.45
Cost of Services:	\$0.00
Surcharges:	\$0.00
Postage Affixed:	\$0.00
Total:	\$12.45

Help Lock Quit Tasks Done

EXHIBIT 4, p. 11

Mailing - Summary

Your **6.20oz** package will be delivered by

Express Mail PO-Addressee

to **LITTLE ROCK, AR 72201 Zone: 3**

at a cost of **\$14.45**

Guaranteed delivery: Thursday PM, 10/18/01 No Weekend Delivery. Date - Time In: 10/16/01 - 12:12

Other Information

The following services/surcharges have been requested:

Service:	Insurance (Merch.)
Value:	\$650.00
Cost:	\$2.00

View Forms

Postage Affixed

Sell Stamps

Enclosed Letter

Add/Remove Surcharges

Express Mail PO-Addressee: \$12.45

Cost of Services: \$2.00

Surcharges: \$0.00

Postage Affixed: \$0.00

Federal:401-12345

Total: \$14.45

Help

Lock

Quit

Tasks

Done

Screen for account transactions

Item Entry

Transaction: 1

Store: USPS













Workstation: sys5001

User: 0000/INSTALLER

10/16/01

12:25

Qty	Description	Unit	Total
1	9252 Exp. Mail PO-ADD	0 00	0 00
	Destination: 72201		
	Weight: 6.20oz		
	Insurance (Merch.) 2.00		
	Label Number: B12345677		
	Federal Agency: 401		

 Sales	 Mailing
 Customer Svcs	 Money Order
 Exp Mail Cutoff	 Road Scale
 Key Item Code	 Misc GLA Entry
 Info Lookup	 Mail Pickup
 Cash for Stamps	 Non-Rev Pickup

SubTotal: 0.00

Tax: 0.00

Total: 0.00

Help	Lock	Quit	Tasks
------	------	------	-------

Done

Domestic Mail

3:53 PM Mon, Oct 15, 2001 - 9.00.035.002

**Enter / confirm ZIP Code
or select a dynakey.**

For Flat Articles, add 4 digits.

Off lbs.

Off oz.



0.00oz \$0.00

Subtotal \$0.00

Single Stamp
Sale



Sell Domestic
Money Order
with Fee



International
Mail



Zero Scale



Standby



Sell by Item
Number



**Total:
\$0.00**

NCR POS ONE EXPRESS MAIL WORK FLOW

Domestic Mail

3:55 PM Mon, Oct 15, 2001 - 9.00.035.002

What are you mailing?

Toggle on/off <Surcharges> if applicable.
For Express Mail, scan the barcode label.

0 lbs. 6.90 oz.

HOUSTON TX 77201

6.90oz

\$0.00

Subtotal

\$0.00

Total:
\$0.00

Letter/

Correspondence

Package/

Merchandise

Flat

Priority Mail

Express Mail

Certified Mail w/
Return Receipt

Priority Mail w/
Insurance

Surcharges



Domestic Mail

3:56 PM Mon, Oct 15, 2001 - 9.00.035.002


Select mail class:

Press [Help] to view size restrictions.

0 lbs.	6.90 oz.
--------	----------

1. Express Mail PO-PO	2nd day 10AM	\$9.55
2. Express Mail PO-PO Flat Rate	2nd day 10AM	\$14.10
		\$0.00
4. Express Mail PO-ADD	Nextday 3PM	\$12.45
5. Express Mail PO-ADD Flat Rate	Nextday 3PM	\$16.25
		\$0.00
Express Mail Same Day Airport		\$0.00
Express Mail Same Day Airport - Flat Rate		\$0.00

Total:
\$0.00

Express Mail PO-PO 

Express Mail PO-PO Flat Rate 

Express Mail PO-ADD 

Express Mail PO-ADD Flat Rate 

Express Mail Same Day Airport 

Express Mail Same Day Airport - Flat Rate 

Domestic Mail

3:58 PM Mon, Oct 15, 2001 - 9.00.035.002

Select Express Mail delivery option:

0 lbs. 6.90 oz.

HOUSTON, TX 77201 Express Mail	6.90oz.	\$12.45
PO-ADD		
Nextday 3PM		
	Subtotal:	\$12.45

Total
\$0.00

Normal



No Weekend



No Holiday



No Weekend or
Holiday





Domestic Mail

3:59 PM Mon, Oct 15, 2001 - 9.00.035.002

Select a destination type:

Street Address



P.O. Box



0 lbs. 6.90 oz.

HOUSTON, TX 77201 Express Mail, 6.90oz	\$12.45
PO-ADD	
Nextday 3PM / No Holiday Delivery	
Subtotal	\$12.45

Total:
\$0.00



Domestic Mail

3:59 PM Mon, Oct 15, 2001 - 9.00.035.002

Select special service and/or

<Continue...>:

Do you want insurance? Select <Continue...> when done.

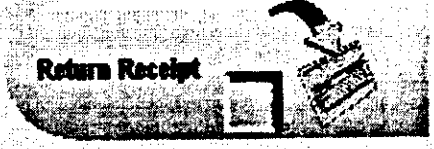
0 lbs.	6.90 oz.	
--------	----------	--



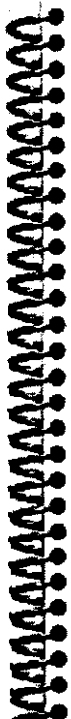
Insured



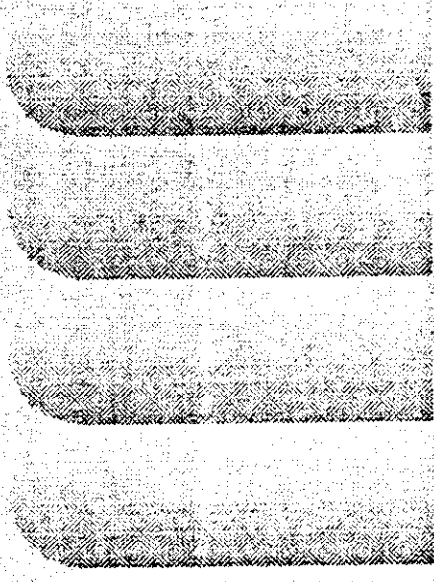
COD



Return Receipt



1.	Insured(Optional merchandise insurance from \$500.01 to \$5000.00)	\$1.00
2.	COD(up to \$1000.00)	\$4.50
3.	Return Receipt	\$1.50



Continue To Finish





Domestic Mail

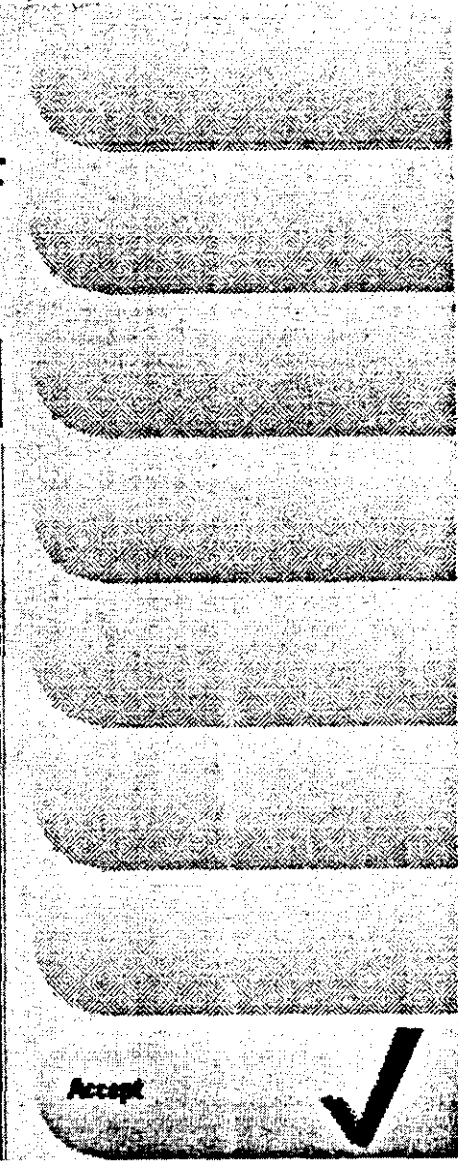
4:01 PM Mon, Oct 15, 2001 - 9.00.035.002

Enter Insurance Amount :

0	lbs.	6.90	oz.	\$	0.00
---	------	------	-----	----	------



Insurance Amount :	\$750.00



Accept





Domestic Mail

4:02 PM Mon, Oct 15, 2001 - 9.00.035.002

Scan/enter the Express Mail barcode label:

This article cannot be completed until label number is scanned / entered.

0 lbs. 6.90 oz.

[Empty rectangular box for barcode label number]



HOUSTON TX 77201, Express Mail	6.90oz	\$12.45
PG-ADD		
Nextday 3PM / No. Holiday Delivery		
Insured		\$3.00
Insurance Amount	\$750.00	
Subtotal		\$15.45

Print PDF



Postage Stamp



No Postage Required



Paying by Account



Postage Affixed



Certificate of Mailing



Add/Change Services



Change ZIP / Class / Surcharges



Domestic Mail

4:03 PM Mon, Oct 15, 2001 - 9.00.035.002

What kind of postage?

To make changes,
select <Change ...> dynakey.

0 lbs. 6.90 oz.

1

HOUSTON TX 77201 Express Mail 6.90oz \$12.45
PO-ADD
Label Serial Number ELD63157106US
Nextday 3PM / No Holiday Delivery
Insured \$3.00
Insurance Amount \$750.00
Subtotal \$15.45

Print PFI



Issue Stamps



No Postage
Required



Paying by
Account



Postage Affixed



Certificate of
Mailing



Add/Change
Services



Change ZIP /
Class /
Surcharges



Domestic Mail

4:04 PM Mon, Oct 15, 2001 - 9.00.035.002

Enter 3-digit control number.

0 lbs. 6.90 oz.

Corporate
Account

Federal Agency
Account

Account Type : Federal Agency Account

Control No.:

Sub-control No.:

Federal Agency Name:

Accept





Domestic Mail

4:05 PM Mon, Oct 15, 2001 - 9.00.035.002

**Enter / confirm ZIP Code
or select a dynakey.**

For Flat Articles, add 4 digits.

Off lbs.

Off oz.

HOUSTON TX 77201 Express Mail 6.90oz. \$12.45

PO-ADD

Label Serial Number: ELD63457106US

Nextday 3PM /No Holiday Delivery

Insured \$3.00

Insurance Amount : \$750.00

Paid by account: \$15.45

Federal agency account number: 401

Sub-control No. 12345

0.00oz \$0.00

Subtotal: \$0.00

**Total:
\$0.00**

Single Stamp
Sale



Sell Domestic
Money Order
with Fee



International
Mail



Zero Scale



Standby



Sell by Item
Number



EXPRESS MAIL P.O. TO ADDR.

ENTER THE ITEM NUMBER
USING KEYBOARD OR SCANNER

B12345678

PRESS "ENTER" TO CONTINUE, "RESET" TO EXIT

MANUAL WEIGHT

1	0.0
POUNDS	OUNCES

ZONE 8

26801
ZIP CODE

SAT FEB 10, 2001 14:54

BASE RATE	18.25
INSURANCE DEC\$	
C.O.D. DEC\$	
RETURN RECEIPT	
MISC. POSTAGE	

ZIP 87102
ITEM B12345678
PAYMENT METHOD
VER: 0801 REV: 00-00-00 00:00

CUTOFF 12:00
2ND DAY SERVICE AVAILABLE

\$	16.25
TOTAL CHARGES	

Sample Express Mail Transaction Screen

SAMPLE UNISYS IRT DOMESTIC EXPRESS MAIL SCREEN

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE:

(a) It is possible that some postal employees were aware of this statement.

Others may not have been aware of this particular statement, but were familiar with this aspect of tax law. For others, the knowledge of postal products does not require a knowledge of tax law. The Postal Service does not see itself as a tax adviser for its customers.

(b) Based on the statement in Publication 17, a taxpayer would not meet a filing deadline based on the speedier delivery for Priority Mail or Express Mail, because meeting the deadline appears to depend on the postmark date. A customer might select these products for other reasons, such as the option to obtain delivery status information over the Internet or by phone, and an interest in getting the filing to the IRS quicker for peace of mind or to receive a refund faster.

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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.

RESPONSE:

(a)-(f) Objection filed October 17, 2001.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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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.

RESPONSE:

The Express Mail Next Day Service data provided below were derived from the Domestic mail master file:

(a) Total Saturday volume and revenue for FY 2000- 4,675,362 and \$68,217,425.35; for FY 2001- 4,419,905 and \$65,461,186.65.

(c) The Postal Service does not track the data requested.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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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?

Response:

- a. Generally no. Volume would not be sent to manual sortation at the detriment of automated or mechanized processing. Depending on the operation, local procedures, and mail availability, they might process some other class of mail to "fill-in" for light First-Class volumes.
- b. Certainly, there is some variation. The time that mail arrives in an operation is ultimately dependent on the time that mail arrives at the plant, subject, of course, to any constraints in previous operations.

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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) 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.

RESPONSE:

There is no master listing available at the Headquarters level that contains this information. Dispatch schedules for post offices across the country are established locally within each district and are based on the time required to transport the mail from the originating office for introduction into the processing point by the critical entry time.

- (a) Yes, customers can still purchase Express Mail service between the time of the final dispatch and the closing of the retail lobby, but it will not be delivered the next day. In these instances, Express Mail Next Day Service items mailed after the final dispatch are accepted for delivery on the second day

**RESPONSE OF UNITED STATES POSTAL SERVICE
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after mailing. Window clerks are instructed to advise customers of this fact before they accept the Express Mail piece for mailing.

(b) It remains in the originating office until the next scheduled dispatch time.

(c)-(e) The requested information is not tracked by the Postal Service.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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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.

RESPONSE:

(a) (1) and (2)- The Postal Service does not track the requested data

(3) FY 2000- \$10,340,595, FY 2001- \$13,496,083

(b)-(d) The Postal Service does not track the requested data.

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

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.

RESPONSE:

Attached are three figures that update Figures 1, 2, and 3 USPS-T-28/R2000-1. Figure 1 provides the shape mix (i.e., the volume distribution by shape and by weight) for First-Class Single-Piece Mail (Attachment A). Figure 2 provides the shape mix for First-Class Presort Mail (Attachment B). Figure 3 provided the shape mix for Standard Regular Mail (Attachment C). These figures were developed using Base Year volumes reported in USPS-LR-J-58 (in sheet 'volumes&lbs' in Excel workbooks LR58ASP.xls, LR58PRE.xls, and LR58AREG.xls). The underlying volumes and all calculations are shown in the spreadsheet found in LR-J-146.

Figure 1: BY Volume Distribution by Shape by Ounce Increment for First-Class Single-Piece Mail

Weight <	1 oz.	2 oz.	3 oz.	4 oz.	5 oz.	6 oz.	7 oz.	8 oz.	9 oz.	10 oz.	11 oz.	12 oz.	13 oz.
% Letters	99.1%	55.4%	23.8%	10.7%	5.4%	3.1%	2.1%	1.2%	0.8%	0.5%	0.6%	0.2%	0.1%
% Flats	0.8%	42.9%	71.2%	82.0%	84.1%	84.7%	82.6%	82.4%	78.9%	78.3%	76.7%	75.0%	73.2%
% Parcels	0.1%	1.7%	5.0%	7.4%	10.5%	12.2%	15.3%	16.5%	20.3%	21.3%	22.7%	24.7%	26.6%

Supporting data can be found in USPS-LR-J-58

Figure 2: BY Volume Distribution by Shape by Ounce Increment for First-Class Presort Mail

Weight <	1 oz.	2 oz.	3 oz.	4 oz.	5 oz.	6 oz.	7 oz.	8 oz.	9 oz.	10 oz.	11 oz.	12 oz.	13 oz.
% Letters	99.7%	81.8%	40.6%	22.2%	13.2%	2.0%	1.2%	0.2%	0.8%	0.2%	0.5%	0.3%	0.0%
% Flats	0.3%	18.2%	59.0%	77.3%	85.8%	96.3%	97.1%	98.0%	98.6%	98.7%	98.8%	99.2%	100.0%
% Parcels	0.0%	0.0%	0.4%	0.5%	1.0%	1.7%	1.8%	1.7%	0.6%	1.1%	0.7%	0.4%	0.0%

Supporting data can be found in USPS-LR-J-58

Figure 3: BY Volume Distribution by Shape by Ounce Increment for Standard Regular Mail

Weight	0 - 1 oz.	1 - 2 oz.	2 - 3 oz.	3 - 5 oz.	5 - 7 oz.	7 - 9 oz.	9 - 11 oz.	11 - 13 oz.	Over 13 oz.
% Letters	96.1%	68.5%	30.6%	6.5%	0.4%	0.2%	0.2%	0.1%	0.2%
% Flats	3.9%	31.4%	68.5%	92.8%	95.3%	85.6%	67.8%	49.8%	68.2%
% Parcels	0.0%	0.2%	0.9%	0.7%	4.3%	14.2%	32.0%	50.1%	31.6%

Supporting data can be found in USPS-LR-J-58

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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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 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 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 letters-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.

RESPONSE:

- (a) See the response to OCA/USPS-12(a).
- (b) See the response to OCA/USPS-12(b).
- (c) See the response to OCA/USPS-12(c).
- (d) See the response to OCA/USPS-12(d).

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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 letters-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.

RESPONSE:

- (a) See the response to OCA/USPS-13(a).
- (b) See the response to OCA/USPS-13(b).
- (c) See the response to OCA/USPS-13(c).
- (d) See the response to OCA/USPS-13(d).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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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.

RESPONSE:

As stated in the response to OCA/USPS-12(d):

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.

The First-Class Mail letters and cards cost models cover a greater number of rate proposals (e.g., Qualified Business Reply Mail and the nonstandard surcharge) than the cost models for Standard Mail letters. Consequently, the number of cost models for First-Class Mail letters and cards is greater than the number of cost models for Standard Mail letters.

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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.

RESPONSE:

As proposed in this docket, First-Class Mail flats would have more rate categories than Standard Mail Flats. First-Class Mail would contain five flats rate categories: nonautomation presort, automation mixed ADC presort, automation ADC presort, automation 3-digit presort, and automation 5-digit presort. By contrast, *four rate categories would be maintained within Standard Mail.* These include: basic nonautomation presort, 3-/5-digit nonautomation presort, basic automation presort, and 3-/5-digit automation presort. Consequently, the number of cost models required to support the Postal Service rate proposals is greater for First-Class Mail than it is for Standard Mail.

The First-Class Mail flats rate structure also resulted in a situation where additional cost models had to be developed where the presort levels were held constant. These models were developed for the purpose outlined in USPS-T-24, Section III(C).

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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.

Response:

MODS does not track volume by class or subclass.

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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.

Response:

MODS does not track volume by class or subclass.

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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.

Response:

See response to the same question, OCA/USPS-11.

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OCA/USPS-42 -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.

Response:

(a) For the most part, this can be confirmed with limited exceptions. Standard Mail letters are not processed through the Advanced Facer Cancellor System (AFCS) and consequently the Direct Connect System (DCS), since postage is paid through meters, permit imprints, or precanceled stamps. Also, prebarcoded pieces likely would not be processed through the MLOCR or Letter Mail Labeling

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

Machine (LMLM), unless the barcode was unreadable and a barcode clear zone did not exist. Prebarcoded pieces entered at automation rates would likely avoid the tabbing equipment, since mailing standards require customers to tab, when appropriate. Finally, any automation 5-digit or carrier route presort for manual zones would not be processed on any of this equipment.

- (b) Prebarcoded First-Class Mail and Standard Mail letter-shaped pieces are typically processed separately until they reach delivery point sequence processing. In DPS, usually Standard Mail is run first on the first pass of DPS during tours 2 and 3. First-Class Mail is usually run on the first DPS pass on tours 3 and 1. Regardless, all the First-Class Mail and Standard Mail letter and card volume becomes commingled on the second DPS pass.
- (c) In most instances, barcoded First-Class Mail and Standard Mail letter-shaped pieces do receive automated processing on equipment. Exceptions would be for equipment rejects as well as First-Class Mail and Standard Mail Enhanced Carrier Route (ECR) and 5-digit presorted automated letters for zones that do not receive incoming secondary processing on automated equipment. In these cases, the work sharing value is realized through the carrier route sort. Also see response to subpart (a).
- (d) See response to subpart (b).

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

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.

Response:

(a) Confirmed depending on equipment availability (*e.g.*, is there an FSM 1000 at the destinating facility) and mailpiece machinability. One exception would be 5-digit automation presorted volumes for manual zones (which do not receive incoming secondary processing to carrier route on FSMs).

**RESPONSE OF UNITED STATES POSTAL SERVICE
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- (b) Prebarcoded First-Class Mail and Standard Mail flat-shaped pieces are typically processed separately in all operations.
- (c) Currently, all barcoded flat-shaped pieces are prebarcoded. See response to subpart (a).
- (d) See response to subpart (b).

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

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.

Response:

(a) *Data that provides machine throughputs in relation to piece weight was provided in Docket No. MC95-1 in response to interrogatory MMA/USPS-T2-12. See attachment.*

(b) This can not be confirmed. The testing used to generate the data provided in response to MMA/USPS-T2-12 involved the use of test decks, not specifically Standard Mail and First-Class Mail.

ORIGINAL

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

RECEIVED
JUN 16 4 39 PM '95
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAIL CLASSIFICATION SCHEDULE, 1995
CLASSIFICATION REFORM I

Docket No. MC95-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PAJUNAS TO INTERROGATORIES OF
MAJOR MAILERS ASSOCIATION
(MMA/USPS-T2-10-12)

The United States Postal Service hereby provides the response of witness Pajunas to the following interrogatories of the Major Mailers Association: MMA/USPS-T2-10-12, filed on June 2, 1995. Interrogatories 10 and 11 have been redirected to witness Smith.

The interrogatories are stated verbatim and are followed by the response.¹

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

John L. DeWeerd
Chief Counsel
Classification and Customer Service

Grayson M. Poats

Grayson M. Poats
Senior Counsel, Classification

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1146
June 16, 1995



¹ To the extent that MMA's instructions contain legal argument purporting to describe the Postal Service's discovery obligations, the Postal Service has not relied upon MMA's interpretation in preparing responses.

**U. S. POSTAL SERVICE WITNESS ANTHONY M. PAJUNAS
RESPONSE TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION**

MMA/USPS-T2-12. Please refer to your Response to Interrogatory MMA/USPS-T2-3 (A), (B) and (E), where you state that--compared with a one-ounce First-Class or Standard Automation letter of a particular type--a 2.9 ounce letter of the same subclass and type "would experience lower throughput on the [automated] equipment."

(A) Please provide copies of any studies that reach or support that conclusion.

(B) To your knowledge (and so far as you can determine without unreasonable burden), does the Postal Service have any study that quantifies the change (or difference) in unit costs attributable to such lower throughput.

(C) If your answer to Paragraph (B) is other than no:

(1) Quantify the change (or difference) in unit costs attributable to each lower throughput.

(2) Provide back up and worksheets showing the derivation and computation of such quantifications.

(3) Identify the studies related to each such quantification and:

(a) Provide a copy of each such study, or

(b) If a privilege against production is asserted, identify the grounds of the privilege and which portions of the document are covered by the privilege and which are not covered.

RESPONSE:

(A) See the attached information from Engineering.

(B) No.

(C) Not applicable.

ENGINEERING



June 16, 1995

MEMORANDUM FOR TONY PAJUNAS

SUBJECT: Heavy Mail Testing

On at least three occasions; i.e., April 1989, August 1992 and the most recent study dated February 15, 1994, the Engineering Center has conducted studies concerning the relationship of heavy mail to the throughput of our automated letter equipment. We have found that in most cases as the weight of the letter increases the throughput (pieces fed per hour) decreases.

Tests were conducted both with pure runs as well as intermixed with the existing mail base, and the same conclusion was reached—throughput decreased as the heavier mail is fed.


L. A. Kidd, Manager
Distribution Technology

Summary of EDC's Throughput Testing
of Heavier Mailpieces on the
Automation Equipment

The following is a summary of EDC's past testing of heavier mailpieces on the Automation Equipment. As can be seen from this table, the throughput decreases as the weight of the mailpiece increases. Tests conducted in 4/89, 11/89, 5/90 and 4/91 were homogeneous runs and therefore show the greatest throughput reduction. This would be representative of the equipments throughput in an 'originating' operation.

1.75 oz	24,710	pcs/hr
2.0	22,640	
2.25	22,120	
2.50	17,820	
2.75	16,910	
3.00	15,530	
3.25	15,500	
3.50	13,380	
4.50	10,900	

In August 1990, April 1991, and June 1991, EDC performed tests that consisted of heavier mailpieces intermixed with typical #10 enveloped pieces. This would be representative of 'secondary' operations. Again, the throughput decreases as the mailpiece weight increases, but not as drastically as the homogeneous test.

Heavyweight Mail Intermixed in Percentage Increments

Percent Heavyweight Pieces (%)	Throughput (pcs/hr)
0	34,100
1	33,900
3	33,400
5	33,500
7	33,300
9	32,200
11	32,600
13	32,500
15	31,400

MACHINABLE REQUIREMENTS FOR AUTOMATION

WEIGHT VS. THROUGHPUT TEST

A number of field offices assisted with the testing of heavy Third Class letter sized mailpieces to determine the effect that weight has on throughput. Unfortunately, these results proved to be inconclusive because the characteristics of the live mail from the many offices varied greatly. (Length, height, and thickness of samples, within weight categories, for example). To obtain substantial results, mailpiece characteristics were controlled by using standard #10 envelopes stuffed with inserts to get the desired weight categories (2 oz., 2.25 oz., 2.5 oz., 2.75 oz., 3.0 oz., 3.25 oz., 3.5 oz.) of 1,000 pieces each, thickness ranging from 0.121 inches to 0.2004 inches, and an aspect ratio of 2.303 : 1. Third Class mail presently has a weight limitation of 3.37 ounces of per-piece rates. These results show a 3 - 29% decrease in throughput between a 2.5 ounce piece and a 3.25 ounce piece depending on the equipment used. Pieces weighing more than 2.5 ounces required operator assistance at the feeder due to the inability to be picked-off as constantly as the lighter weight pieces. These pieces also caused more jams in the transport.

It is therefore recommended that in order to be eligible for the price incentive, mailpieces weighing 2.5 ounces or less are automation compatible.

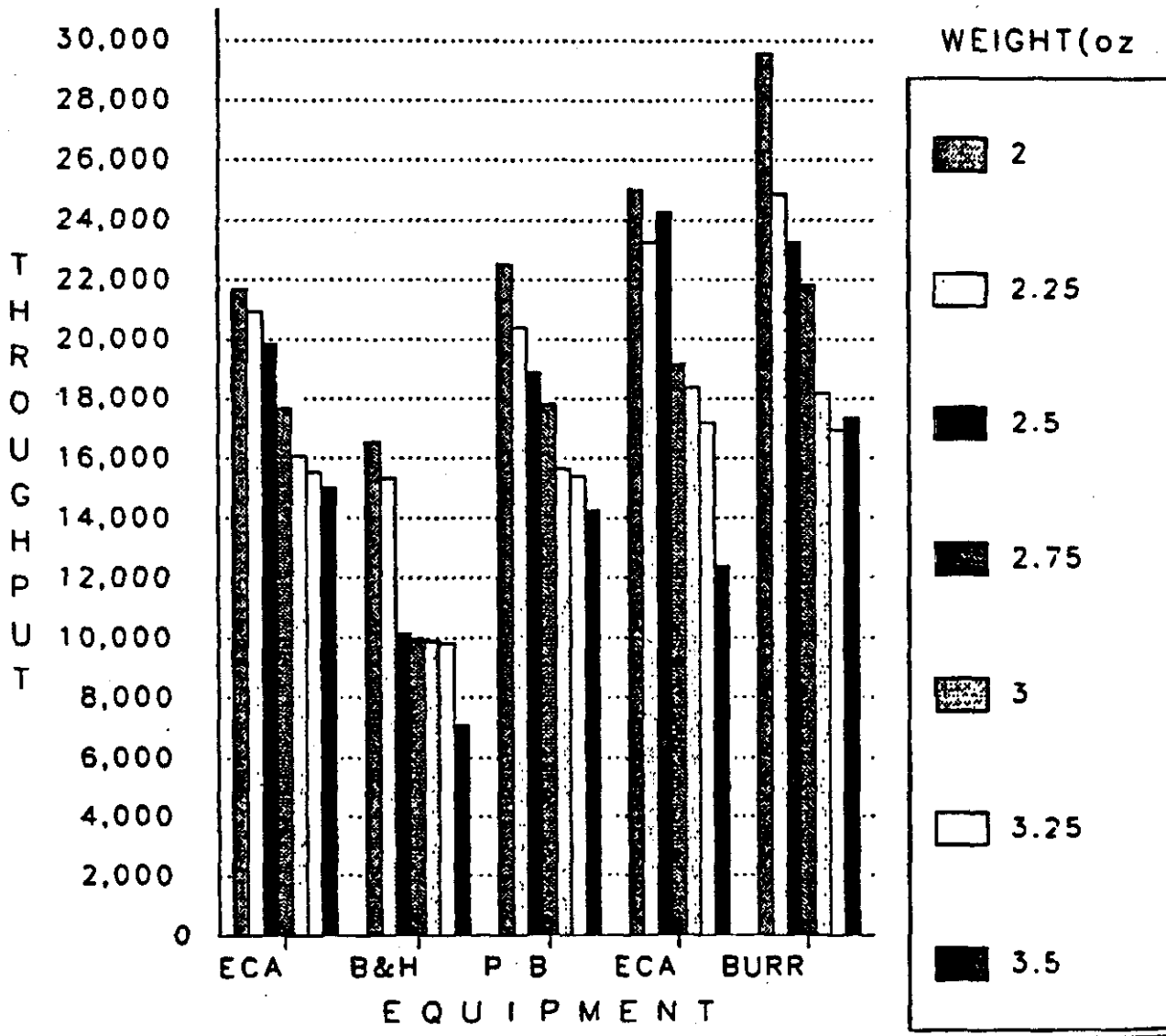
Based on results of previous testing concerning securing mailpieces, it is recommended that all letter-sized mail, with paper exterior being sealed on four sides or two gum tabs of a permanent, pressure sensitive, non-removeable adhesive on the unbound edge of a bound piece is machinable, and folds and edges bound should be oriented down with the address label parallel to the fold or bound edge and the address right side up is readable, is automation compatible.

	DMM	PUB. 25	OUR RECOM.
SIZE	Min. 3 1/2 X 5 Max 6 1/8 X 11 1/2	Min. 3 1/2 X 5 Max 6 1/8 X 10 1/2	Min. Max x 9 1/2
THICKNESS	Min. 0 Max 3/4" or less	Min. .007" Max 0.1875"	Min. Max 0.150"
ASPECT RATIO	NOT MENTIONED	Min. 1.3 : 1 Max 2.5 : 1	Min. Max 2.3 : 1
WEIGHT	Min. Max 16 oz. or less	NOT MENTIONED	Min. Max 2 1/2 oz.
SEALING			MENTIONED ABOVE
ENCLOSURES			NO PENS, PENCILS, OR STIFF (UNBENDABLE) OBJECTS.
COMPOSITION (paper/non)			

HEAVY-WEIGHT MAIL TEST

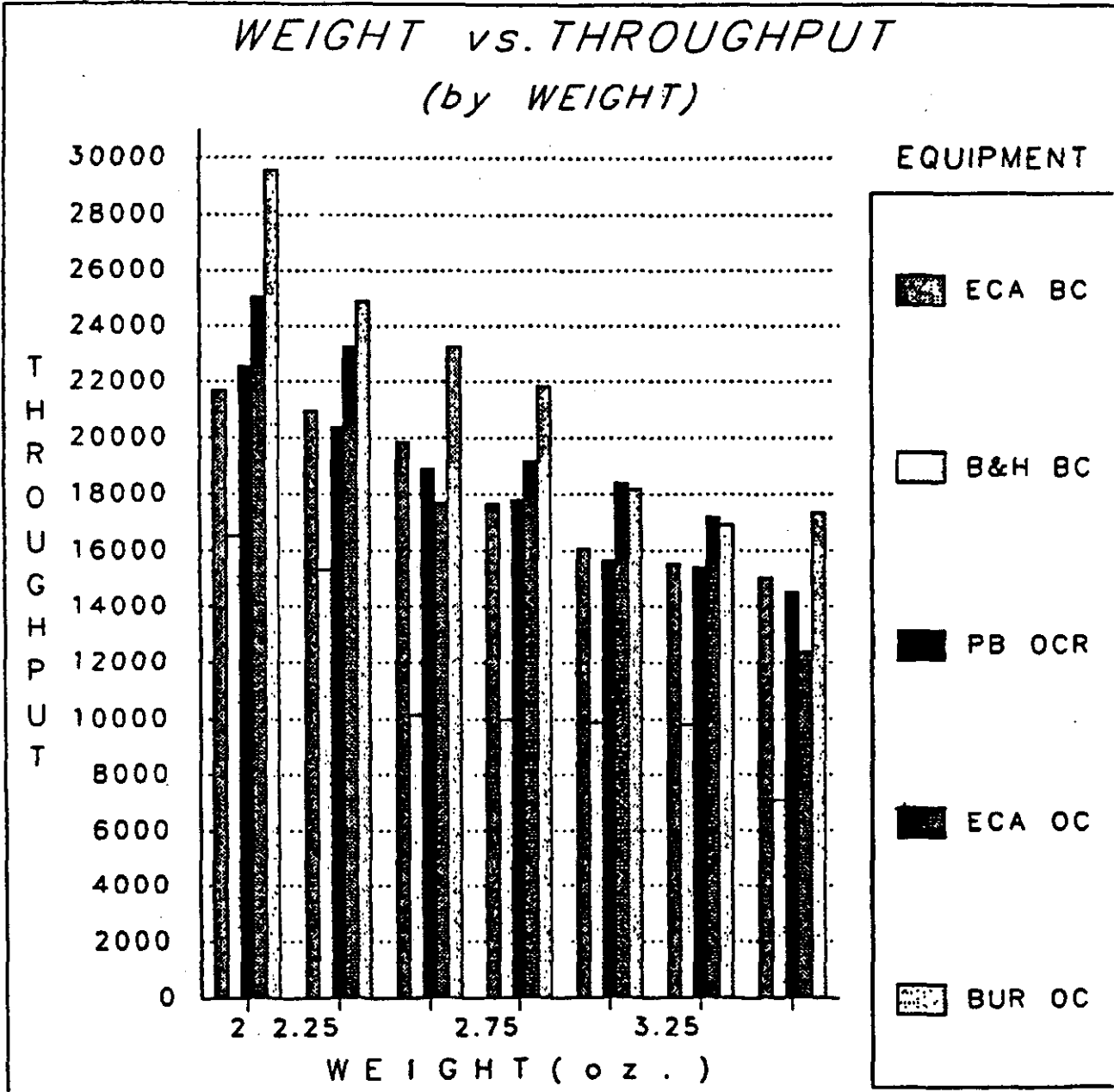
	ECA	B&H	P B	ECA	BURR
2	21,686	16,530	22,523	25,025	29,550
2.25	20,930	15,334	20,393	23,272	24,873
2.5	19,849	10,147	18,886	24,276	23,278
2.75	17,647	9,972	17,800	19,149	21,822
3	16,071	9,900	15,652	18,369	18,164
3.25	15,532	9,819	15,393	17,173	16,913
3.5	15,027	7,080	14,258	12,390	17,328

WEIGHT vs. THROUGHPUT (by EQUIPMENT)



HEAVY-WEIGHT MAIL TEST

	2	2.25	2.5	2.75	3	3.25	3.5
A BCS	21686	20930	19849	17647	16071	15532	15027
B&H BCS	16530	15334	10147	9972	9900	9819	7080
PB OCR	22523	20393	18886	17800	15652	15393	14528
ECA OCR	25025	23272	17697	19149	18369	17173	12390
BUR OCR	29550	24873	23278	21822	18164	16913	17328



ATTACHMENT TO CONTRACTORS 4/24/01 10 of 10

SITE	WT. (oz.)	t (in.)	L (in.)	H (in.)	ASPECT RATIO	THROUGHPUT (pcs./hr.)				
						OCR's			BCS's	
						ECA	PITNEY BOWES	BURROUGHS	ECA	BELL & HOWELL
JACKSONVILLE, FL	1.97	0.141	9 3/8	4 1/8	2.723	($\frac{355\text{pcs.}}{.0144\text{hrs.}}$) 24,577	($\frac{355\text{pcs.}}{.01638\text{hrs.}}$) 21,661	----	($\frac{350\text{pcs.}}{.0144\text{hrs.}}$) 24,230	----
	2.03	0.172	9 /12	4 1/8	2.303	($\frac{311\text{pcs.}}{.0125\text{hrs.}}$) 24,800	($\frac{307\text{pcs.}}{.0183\text{hrs.}}$) 16,745	----	($\frac{311\text{pcs.}}{.0125\text{hrs.}}$) 24,880	----
	2.46	0.141	9	5 3/4	1.565	($\frac{491\text{pcs.}}{.02083\text{hrs.}}$) 23,568	($\frac{491\text{pcs.}}{.02138\text{hrs.}}$) 22,909	----	($\frac{491\text{pcs.}}{.02277\text{hrs.}}$) 21,556	----
	3.49	0.172	9 1/2	5 3/4	1.652	($\frac{232\text{pcs.}}{.01583\text{hrs.}}$) 14,653 ...	($\frac{232\text{pcs.}}{.02416\text{hrs.}}$) 9,559	----	($\frac{234\text{pcs.}}{.00888\text{hrs.}}$) 26,325	----
KANSAS CITY, MO	2.00	0.125	9 1/2	6	1.583	($\frac{454\text{pcs.}}{.02388\text{hrs.}}$) 19,005	----	($\frac{409\text{pcs.}}{.0361\text{hrs.}}$) 11,361	($\frac{449\text{pcs.}}{.02916\text{hrs.}}$) 15,377	($\frac{449\text{pcs.}}{.01472\text{hrs.}}$) 30,498
	2.50	0.125	9	6	1.50	($\frac{322\text{pcs.}}{.02083\text{hrs.}}$) 15,456	----	($\frac{244\text{pcs.}}{.02722\text{hrs.}}$) 8,963	($\frac{322\text{pcs.}}{.02694\text{hrs.}}$) 11,951	($\frac{322\text{pcs.}}{.01444\text{hrs.}}$) 22,292
	3.00	0.250	9 1/2	4 1/2	2.11	($\frac{388\text{pcs.}}{.02577\text{hrs.}}$) 15,349	----	($\frac{288\text{pcs.}}{.07139\text{hrs.}}$) 4,034	($\frac{392\text{pcs.}}{.01528\text{hrs.}}$) 11,200	($\frac{392\text{pcs.}}{.01528\text{hrs.}}$) 25,658
SAN DIEGO, CA	2.00	0.1875	8 3/4	6	1.458	($\frac{401\text{pcs.}}{.02083\text{hrs.}}$) 19,248	($\frac{395\text{pcs.}}{.06694\text{hrs.}}$) 5,900	($\frac{414\text{pcs.}}{.06639\text{hrs.}}$) 6,216	($\frac{402\text{pcs.}}{.04222\text{hrs.}}$) 9,544	----
	2.50	0.1250	9	5 3/4	1.565	($\frac{742\text{pcs.}}{.02972\text{hrs.}}$) 24,964	($\frac{728\text{pcs.}}{.06805\text{hrs.}}$) 10,670	($\frac{764\text{pcs.}}{.06639\text{hrs.}}$) 11,471	($\frac{741\text{pcs.}}{.02861\text{hrs.}}$) 25,899	----
	3.00	0.1875	9	5 3/4	1.565	($\frac{473\text{pcs.}}{.02111\text{hrs.}}$) 22,405	($\frac{452\text{pcs.}}{.13833\text{hrs.}}$) 3,262	($\frac{497\text{pcs.}}{.08305\text{hrs.}}$) 5,964	($\frac{469\text{pcs.}}{.02555\text{hrs.}}$) 18,352	----

SITE	WT. (oz.)	I (in.)	L (in.)	H (in.)	ASPECT RATIO	THROUGHPUT (pcs./hr.)			BCS's	
						ECA	PITNEY BOWES	BURROUGHS		
INDIANAPOLIS, IN	2	0.090	9 1/2	5 3/4	1.652	($\frac{597\text{pcs.}}{0.611\text{hrs.}}$) 25,285	---	---	($\frac{603\text{pcs.}}{0.244\text{hrs.}}$) 24,668	---
	2.6	0.172	9	4 1/4	2.118	($\frac{379\text{pcs.}}{0.2055\text{hrs.}}$) 18,438	---	---	($\frac{380\text{pcs.}}{0.1639\text{hrs.}}$) 23,186	---
	3.25	0.182	8 7/8	5 1/2	1.614	($\frac{398\text{pcs.}}{0.1917\text{hrs.}}$) 17,635	---	---	($\frac{342\text{pcs.}}{0.1833\text{hrs.}}$) 18,654	---
	1.862	0.135	9 1/2	4 1/4	2.235	($\frac{878\text{pcs.}}{0.4028\text{hrs.}}$) 21,799	($\frac{885\text{pcs.}}{0.0597\text{hrs.}}$) 14,819	($\frac{899\text{pcs.}}{0.2253\text{hrs.}}$) 39,896	($\frac{890\text{pcs.}}{0.0366\text{hrs.}}$) 24,272	($\frac{890\text{pcs.}}{0.0872\text{hrs.}}$) 10,204
	1.869	0.170	8 1/2	4 1/4	2.005	($\frac{1,189\text{pcs.}}{0.7972\text{hrs.}}$) 14,914	($\frac{979\text{pcs.}}{1.1889\text{hrs.}}$) 10,068	($\frac{1,180\text{pcs.}}{0.7134\text{hrs.}}$) 16,690	($\frac{1,038\text{pcs.}}{0.05139\text{hrs.}}$) 20,198	($\frac{1,008\text{pcs.}}{1.1028\text{hrs.}}$) 9,141
	2.021	0.153	9 1/2	4 1/4	2.235	($\frac{630\text{pcs.}}{0.3139\text{hrs.}}$) 20,071	($\frac{584\text{pcs.}}{0.7889\text{hrs.}}$) 7,770	($\frac{622\text{pcs.}}{0.1894\text{hrs.}}$) 32,929	($\frac{633\text{pcs.}}{0.2861\text{hrs.}}$) 22,124	($\frac{633\text{pcs.}}{0.05805\text{hrs.}}$) 10,903
	2.324	0.101	10 3/4	5 1/4	2.048	($\frac{998\text{pcs.}}{0.5472\text{hrs.}}$) 18,238	($\frac{1,002\text{pcs.}}{0.7194\text{hrs.}}$) 13,927	($\frac{1,001\text{pcs.}}{0.0544\text{hrs.}}$) 18,385	($\frac{998\text{pcs.}}{1.0667\text{hrs.}}$) 9,356	
	3.129	0.226	9 1/4	4 1/2	2.055	($\frac{1,003\text{pcs.}}{0.09\text{hrs.}}$) 11,144	($\frac{1,005\text{pcs.}}{1.611\text{hrs.}}$) 6,238	($\frac{989\text{pcs.}}{0.6259\text{hrs.}}$) 7,980	($\frac{1,004\text{pcs.}}{0.075\text{hrs.}}$) 12,954	($\frac{1,006\text{pcs.}}{1.4555\text{hrs.}}$) 6,911
	3.880	0.186	9	5 3/4	1.565	($\frac{808\text{pcs.}}{0.6361\text{hrs.}}$) 12,702	($\frac{813\text{pcs.}}{0.6083\text{hrs.}}$) 13,364	($\frac{815\text{pcs.}}{0.4207\text{hrs.}}$) 19,371	($\frac{818\text{pcs.}}{0.7139\text{hrs.}}$) 11,458	($\frac{816\text{pcs.}}{1.3805\text{hrs.}}$) 5,911
	ORLANDO, FL	2	0.0787	9 1/2	4	2.375	($\frac{1,039\text{pcs.}}{0.433\text{hr.}}$) 23,977	($\frac{1,068\text{pcs.}}{0.4458\text{hr.}}$) 23,105	---	($\frac{1,047\text{pcs.}}{0.475\text{hr.}}$) 22,042
2.5		0.1181	9 3/4	5 3/4	1.698	($\frac{1,024\text{pcs.}}{0.439\text{hr.}}$) 23,332	($\frac{1,024\text{pcs.}}{0.444\text{hr.}}$) 23,049	---	($\frac{1,024\text{pcs.}}{0.392\text{hr.}}$) 26,144	($\frac{1,011\text{pcs.}}{0.534\text{hr.}}$) 25,631
3		0.1968	8 7/8	5 7/8	1.5108	($\frac{1,010\text{pcs.}}{0.428\text{hr.}}$) 23,610	($\frac{1,026\text{pcs.}}{0.436\text{hr.}}$) 23,480	---	($\frac{1,022\text{pcs.}}{0.381\text{hr.}}$) 26,855	($\frac{1,019\text{pcs.}}{0.397\text{hr.}}$) 25,653

Attachments to call log - 7/20/10 12:05:10

SITE
SO. MARYLAND DIV.

WT. (oz.)	L (in.)	H (in.)	ASPECT RATIO	ECA	OCR
2.0	0.625	9 1/2	5 1/2	1.727	803pcs. .03138hrs. 25.582
2.0	0.325	8	6	1.333	484pcs. .01724 30.041
2.5	0.9375	7 1/2	4 1/4	1.765	368pcs. .01222hrs. 30.109
3.0	0.125	8 1/2	5 1/2	1.545	364pcs. .01305 27.881
3.0	0.125	8 1/2	5 1/2	1.545	367pcs. .01333hrs. 27.525
3.5	0.125	9	6	1.5	500pcs. .03305hrs. 15.126
3.5	0.0625	9	5 3/4	1.565	107pcs.

WT. (oz.)	L (in.)	H (in.)	ASPECT RATIO	ECA	BCS
2.0	0.03125	9	6	1.5	(399pcs.) .01194hrs. 33.404
2.0	0.03125	9	6	1.5	238pcs. .00944hrs. 25.200
2.5	0.0625	8	6	1.333	152pcs. .00472hrs. 32.188
2.5	.0625	9 1/2	6	1.583	151pcs. .00611hrs. 24.709
3.0	0.1875	7 3/4	4 1/2	1.722	169pcs. .00722hrs. 23.400
3.0	0.25	8	5 1/2	1.454	444pcs. .01528hrs. 29.061
3.5	0.25	9	6 1/4	1.52	80pcs. .00333hrs. 24.000
3.5	0.25	8	5 1/2	1.454	241pcs. .01167hrs. 20.657

II

WEIGHT VERSUS THROUGHPUT CONTROLLED TEST RESULTS

SPECIFICATIONS


Required	WEIGHT (ounces +/- .05 ounces)	Thickness (inches)
	Actual	
2.00	2.029	0.121
2.25	2.241	0.131
2.50	2.492	0.148
2.75	2.757	0.162
3.00	3.024	0.181
3.25	3.218	0.189
3.50	3.482	0.2004

UNIFORM SIZE: 9 1/2 in. X 4 1/8 in.

ASPECT RATIO (L/H): 2.303

DECLARATION

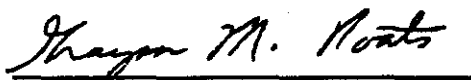
I, Anthony M. Pajunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 6-15-95

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.



Grayson M. Poats

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1146
June 16, 1995

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

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.

Response:

(a) The Postal Service has no data responsive to this request.

(b) Even if throughput data by ounce increment existed for the FSMs, characteristics other than weight would likely affect throughput (dimensions, enveloped, bound, polywrap, etc.)

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

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.

RESPONSE:

- (a) Not confirmed. The figure 17.5164548838487 represents the density of total First-Class Single Piece Mail.
- (b) USPS-LR-J-58 includes updates of Library References USPS-LR-I-91/R2000-1, USPS-LR-92/R2000-1, and USPS-LR-93/R2000-1. To provide ease of comparison, the same format was used in the Excel workbooks that contain the cost calculations in USPS-LR-J-58 as was used in the analogous models in USPS-LR-I-91/R2000-1, USPS-LR-92/R2000-1, and USPS-LR-93/R2000-1. The formula used to calculate the figure 17.5164548838487 was a holdover from the model in USPS-LR-I-91/R2000-1.
- (c) Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

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.

Response:

a. The basis for the statement on page 30 of Linda A. Kingsley's testimony is presented in the network discussion on page 29, line 4, to page 30, line 2, and the example on page 31, line 1, to page 32, line 3.

b. – f. Generally no on weekdays (Monday through Friday except for holidays), although there can be minor variations. For example, a primary scheme running on a parallel machine might be omitted on a light night, reducing the "number", or an incoming secondary flats scheme for a small zone might be omitted (replaced

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

by manual processing) in favor of longer runs for bigger zones on a heavy night, reducing both the "set" and the "number".

On weekends and holidays, some sort schemes will be omitted. For example, the second pass Delivery Point Sequencing (DPS) schemes would be omitted on Sunday and holiday mornings (Tour 1) because there are no delivery on those days. While fewer schemes may be run on weekends, there would be little weekend-to-weekend variation.

- g. Yes. It is dependent on the mix of incoming volume for the day. The classic example is the stacker(s) for the Internal Revenue Service (IRS).

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

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.

Response:

- a. The raw data used for this table consists of the attached series of email messages.
- b. We are not aware of any such sources that are available above the plant level.
- c. See dates in answer a.
- d. Yes. See answer a.
- e. See answer a. Data was not used on the Advanced Facer Canceler System (AFCS) or the Sack Sorter at one plant. The AFCS does not have schemes and the Sack Sorter does not do mailpiece distribution.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

- f. We are told that the requested data is not available.
- g. The Operations Support Specialist is normally responsible for creating or modifying sort schemes. She/he receives one week of training on the Sort Program System (SPS), used for this purpose, and depends on support from other in-plant personnel and the SPS User's Guide. A copy of this large manual in Word format is provided on CDROM as USPS-LR-J-143.

Author: [REDACTED]
Date: 5/1/01 1:50 PM
Normal
TO: [REDACTED]
Subject: Re[4]: numbers needed for rate case

----- Message Contents

[REDACTED] sorry for the delay, I've been involved with a [REDACTED] program that is being tested here at [REDACTED] and I forgot to give you a response.

Forward Header

Subject: Re[4]: numbers needed for rate case
Author: [REDACTED]
Date: 5/1/01 1:44 PM

[REDACTED]

* While mail is running out, mail for next sortplan is loaded on feeders behind old sortplan. Supervisor watches the buckets emptying. As soon as the buckets are down to about 6, pulldown begins. Pulldown and new trays only takes two or three minutes. Trays can be pulled out as many as 4 at a time. As soon as all buckets are empty, Supervisor ends the run and loads new run. By this time empty trays are reloaded onto the machine. New run begins.

* The sortplan changes per machine per day on the MLOCR/ISS should be 6.3. I forgot to divide by the three machines. Sorry about that.

[REDACTED]

Forward Header

Subject: Re[4]: numbers needed for rate case
Author: [REDACTED]
Date: 4/26/01 1:01 PM

[REDACTED] can you verify this for me.

Thanks

Forward Header

Subject: Re[4]: numbers needed for rate case
Author: [REDACTED]
Date: 4/25/01 4:14 PM

[REDACTED]

I would like to check a couple of numbers that I know I will get questions.

* How did you get the Pulldown time on the AFSM 100 down to 3.5 minutes?

* Is the 19 sort plan changes per machine per day on the MLOCR/ISS correct?

Thanks,

Reply Separator

Subject: Re[3]: numbers needed for rate case

Author: [REDACTED]

Date: 4/25/01 10:49 AM

[REDACTED] I tried to copy the same format that [REDACTED] provided you. If you have any questions please let me know.

MACHINE PULLDOWNS AT [REDACTED] P&DC

MACHINE	AVG RUN HRS	AVG # CHANGES	AVG PULLDOWN TIME MINUTES	# MACHINES
AFSM 100	20	13.5	3.5	2
FSM 1000	15.5	2.5	15	1
FSM 881	11	3	10	1
DECS	5	5.6	18	14
SPBS	15.8	4	32	2
MLOCR/ISS	5.2	19	18.6	3
DECS/OSS	6	5	6	3
BCS/OSS	4.3	5.6	18	1
AFCS	4.2	N/A	N/A	3

Legend:

- AVG RUN HRS Average run time per machine per day
- AVG # CHANGES Average number of sort plan changes per machine per day
- AVG PULLDOWN TIME Average minutes it takes to switch to another sortplan
- # MACHINES Number of machines for that category

Forward Header

Subject: Re[2]: numbers needed for rate case

Author: [REDACTED]

Date: 4/23/01 10:52 AM

[REDACTED] For information, the numbers that [REDACTED] sent me for [REDACTED] are below. It will be interesting to see if [REDACTED] is much different.

[REDACTED] 4/25/01 10:49 AM response, 1-491

Thanks,

Forward Header

Subject: Re[2]: numbers needed for rate case
Author: [REDACTED]
Date: 4/20/01 2:46 PM

Statistically correct. [REDACTED]

Reply Separator

Subject: Re: numbers needed for rate case
Author: [REDACTED]
Date: 4/20/01 1:44 PM

This is great.

The way I interpret this, the FSM 1000, for example, is running 13 hours a day on the average, but during that time it is stopped to sweep and change the sort plan for 1 hour. Thus, if there is 13 minutes more mail one day compared to another, the run time would increase by 13 minutes, but the workhours required would only increase by 12 minutes per person.

Am I interpreting this right?

Thanks,

Reply Separator

Subject: numbers needed for rate case
Author: [REDACTED]
Date: 4/20/01 11:52 AM

Here is an estimate of what you asked for. All you need to do is multiply out the avg down time and run times, by the total number of machines if you want the total daily.

MACHINE	AVG RUN	AVG # CHANGES	AVG DOWN	#MACHINES
AFSM 100	18	12	9	2
FSM 1000	13	6	10	2
FSM 881	13	15	10	4
DBCS	14	5	10	24
SPBS	20	4	30	1
ISS	8	1	10	7
OSS	8	1	10	6

Attachment is CWH/VTS-4 BQ response, P3 of 4

OCR	8	1	10	1
BCS	8	1	10	1
AFCS	8	0	0	7
SACK SORT	13	0	0	1

Legend:

AVG RUN Average run time per machine per day
 AVG # CHANGES Average number of sort plan changes per machine per day
 AVG DOWN Average minutes it takes to switch from one sort plan to another per machine
 #MACHINES Number of machines for that category in our facility

Attachment to VHT USPS - 100 response, 11/08/7

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE**

OCA/USPS-49

(a) For a particular operation (*e.g.*, outgoing primary), does the proportion of manual first piece handlings (FPH) (sic) 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.

Response:

a. Yes.

b. Yes.

c. The proportion of non-machinable mail that arrives each day impacts the proportion of daily manual handlings at the plant and each operation (*e.g.* outgoing primary) within the plant.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

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 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.
- (b) 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.

RESPONSE:

- (a) Generally confirmed. Please note, however, that in some locations, it is simply not feasible, given limitations on the availability of transportation, retail and delivery options, to provide Express Mail Next Day Sunday and holiday service. Moreover, due to heightened security as a result of the tragic events of September 11 and some limitations on the availability of transportation, there will temporarily be no Next Day Sunday service for some Express Mail. Express Mail customers are informed of the applicable service guarantees at the point of sale. As events continue to evolve, there may also be other temporary changes. The Postal Service will attempt, where possible, to restore Sunday service levels to those enjoyed prior to September 11.
- (b)-(c) Please see Postal Service response to OCA/USPS-T35-1 (redirected from witness Mayo).

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.



Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
October 18, 2001