

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  
WITNESS BOZZO TO INTERROGATORY OF ASSOCIATION  
OF POSTAL COMMERCE  
(POSTCOM/USPS-T-14-1)

The United States Postal Service hereby provides the response of witness Bozzo to the following interrogatory of Association of Postal Commerce: PostCom/USPS-T-14-1, filed on October 10, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Frank R. Heselton

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October 24, 2001

**POSTCOM/USPS-T14-1.** On page 7 of your testimony, you mention that you visited mail processing facilities to "reality check" your econometric estimates of volume variability.

**(a)** On these visits, did you have an opportunity to observe FSM and manual flat sorting operations?

**(b)** If your answer to subpart (a) is yes, did you notice whether clerks were more likely to sort barcoded flats on machines than they were to sort nonbarcoded flats on machines? If so, please explain fully.

**(c)** Are you aware of any data (whether from MODS, IOCS, or any other source) that quantifies the extent to which barcoded flats are more likely to be processed on machines than nonbarcoded flats? If so, please state the data source and quantify the extent to which barcoded flats are more likely to be processed on machines?

**POSTCOM/USPS-T14-1 Response.**

**(a)** Yes.

**(b)** I did not observe any systematic efforts to direct machinable flats (whether barcoded or not) to manual flat sorting operations at the sites I visited. The sites I visited had all three types of FSM equipment (i.e., the FSM 881, FSM 1000 and AFSM 100) in operation, and few cases for manual flat sorting. The manual flat sorting I observed appeared primarily to process FSM rejects.

**(c)** No. Some combination of IOCS and MODS data could, in principle, be used to quantify the proportions and/or absolute number of piece handlings (TPF) in manual and FSM operations that are of barcoded and non-barcoded flats.

However, those data would not solely indicate the effect of the presence of the barcode on the type(s) of processing used. The data would also depend on (among other things) the presort profile and machinability characteristics of the populations of barcoded and non-barcoded flats receiving processing, which are not directly observed in any data system of which I am aware.

# DECLARATION

I, A. Thomas Bozzo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

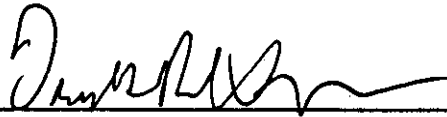
A Thomas Bozzo

Dated: October 24, 2001

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in dark ink, appearing to read 'Frank R. Heselton', written over a horizontal line.

Frank R. Heselton

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