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

Postal Rate and Fee Changes, 2001) Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-142-160)
October 25, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-142. Please refer to the response to OCA/USPS-42 and the table below.

LETTER-SHAPED PIECES				
Mail Processing				
Operation	Equipment	First-Class Single-Piece	First-Class Presort	Standard Mail Regular
[1]	[2]	[3]	[4]	[5]
Entry Activity				
Package Sorting	Conveyors, Hampers, Pouch Racks			
Outgoing RBCS				
ISS/RCR	AFCS-ISS			
	MLOCR-ISS			
	RCR			
OSS	DIOSS			
REC	VDT			
LMLM	LMLM			
Outgoing Primary				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
Outgoing Secondary				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
Incoming RBCS				
ISS/RCR	AFCS-ISS			
	MLOCR-ISS			
	RCR			
OSS	DIOSS			
REC	VDT			
LMLM	LMLM			
Incoming MMP				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			

Incoming SCF/Primary				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
5-Digit Barcode Sort				
	DBCS			
	MPBCS			
Incoming Secondaries				
Auto Carrier Route	DBCS			
	MPBCS			
Auto 3-Pass DPS	CSBCS			
Auto 2-Pass DPS	DBCS			
	MPBCS			
Man Inc Secondary Final at Plant	Letter Cases			
Man Inc Secondary Final at DDU	Letter Cases			
Box Section Sort, DPS	Letter Cases			
Box Section Sort, Other	Letter Cases			

Column [1]: Remote Bar Coding System (RBCS); Input Sub System/Remote Computer Reader (ISS/RCR); Output Sub System (OSS); Remote Encoding Center (REC); Letter Mail Labeling Machine (LMLM); Managed Mail Program (MMP); Sectional Center Facility (SCF); Delivery Point Sequence (DPS); and, Destination Delivery Unit (DDU).
Column [2]: Advanced Facer Canceler System-Input Sub System (AFCS-ISS); Multiline Optical Character Reader-Input Sub System (MLOCR-ISS); Remote Computer Reader (RCR); DBCS/OCR/ISS/OSS (DIOSS); Video Display Terminal (VDT); Letter Mail Labeling Machine (LMLM); Delivery Bar Code Sorter (DBCS); Mail Processing Bar Code Sorter (MPBCS); and, Carrier Sequencing Bar Code Sorter (CSBCS).

a. Please confirm that Column [1] identifies all the mail processing operations in the processing of letter-shaped mail. If you do not confirm, please explain and identify all the mail processing operations associated with the processing of letter shaped mail.

b. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail. If you do not confirm, please explain and

identify all the mail processing equipment used in the processing of letter-shaped mail.

c. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail that is associated with each mail processing operation in Column [1]. If you do not confirm, please explain and identify all the mail processing equipment in each mail processing operation associated with the processing of letter-shaped mail.

d. In Columns [3], [4], and [5], please identify the mail processing equipment used in the processing of letter-shaped First-Class Single-Piece, First-Class Presort, and Standard Mail Regular, respectively.

OCA/USPS-143. Please refer to the response to OCA/USPS-42, the table in interrogatory OCA/USPS-142, and USPS-LR-J-60.

a. From USPS-LR-J-60 at page 46, please match the items in the "Description" column with Column [2], and the items in the "MODS [Management Operating Data System] Productivity" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.

b. From USPS-LR-J-60 at page 48, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.

c. From USPS-LR-J-60 at page 49, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column

d. From USPS-LR-J-60 at page 81, please match the items in the "Description" column with Column [2], and the items in the "MODS Productivity" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

e. From USPS-LR-J-60 at page 83, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

f. From USPS-LR-J-60 at page 84, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

OCA/USPS-144. Please refer to the response to OCA/USPS-44(b).

a. Please confirm that in order to process automation compatible barcoded First-Class and Standard Regular letter-shaped pieces into Delivery Point Sequence (DPS), the Postal Service would use one of the following pieces of equipment: Delivery Barcode Sorter (DBCS), Mail Processing Barcode Sorter (MPBCS) or Carrier Sequence Barcode Sorter (CSBCS). If you do not confirm, please explain and identify all pieces of equipment used to process such letter-shaped pieces into DPS.

b. Please confirm that only barcoded First-Class and Standard Regular letter-shaped pieces sorted to 5-digit are presented to DBCS, MPBCS and CSBCS for processing into DPS. If you do not confirm, please explain.

OCA/USPS-145. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same DBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.

b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.

c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.

d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the DBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.

e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.

f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.

g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same DBCS.

h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same DBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same DBCS. If you do not do not confirm, please explain.

i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-146. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs

one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same MPBCS. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.

b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.

c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.

d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the MPBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.

e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.

f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.

g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same MPBCS. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same MPBCS.

h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same MPBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same MPBCS. If you do not do not confirm, please explain.

i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-147. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same CSBCS. Please confirm that the throughputs and velocities

for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.

b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.

c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.

d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the CSBCS would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.

e. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 2 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 2 ounces.

f. Assume the same facts above and in part a., except that each letter-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each letter-shaped piece in each group weighed 3 ounces.

g. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same CSBCS. Please answer

parts a., b., c., and d. assuming that each letter-shaped piece in each group is processed in two passes on the same CSBCS.

h. Assume the same facts above and in part a., except that each group of letter-shaped pieces is processed in two passes on the same CSBCS. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same CSBCS. If you do not do not confirm, please explain.

i. Please confirm that the responses to parts a. through h. would be the same where the two groups consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-148. Please refer to the response to POSTCOM/USPS-T39-8(a).

a. For the DBCS and MPBCS, please describe the algorithm on the first pass and the second pass that permits the processing of letter-shaped pieces into DPS.

b. For the CSBCS, please describe the algorithm on the first pass, the second pass and the third pass that permits the processing of letter-shaped pieces into DPS.

OCA/USPS-149. Please refer to USPS-LR-J-60.

a. At page 52, please confirm that the presort letters mail flow densities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.

b. At page 89, please confirm that the presort letters mail flow densities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.

c. Please confirm that the mail flow densities on pages 52 and 89 are the same. If you do not confirm, please explain.

d. Please confirm that the identical mail flow densities for First-Class and Standard Regular letter-shaped pieces implies the same sort schemes and the same mail processing operations for First-Class and Standard Regular letter-shaped pieces. If you do not confirm, please explain.

e. At page 46, please confirm that the marginal volume variable productivities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.

f. At page 81, please confirm that the marginal volume variable productivities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.

g. Please confirm that the marginal volume variable productivities on pages 46 and 81 are the same. If you do not confirm, please explain.

h. Please confirm that the identical marginal volume variable productivities for First-Class and Standard Regular letter-shaped pieces implies the same costs for First-Class and Standard Regular letter-shaped pieces undergoing the same mail processing operations. If you do not confirm, please explain.

OCA/USPS-150. Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Bozzo since June 1996.

OCA/USPS-151. Please provide copies of every document relating to mail processing operations that is available to Postal Service supervisors, managers, planners, In-Plant Support personnel, Headquarters Processing Operations personnel, or Operations Support personnel.

OCA/USPS-152. Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Kingsley since June 1996.

OCA/USPS-153. Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Van-Ty-Smith since June 1996.

OCA/USPS-154. Please provide a list of every document relating to mail processing operations, peak-load costs, or production under uncertainty that was relied on by witnesses Bozzo, Kingsley, or Van-Ty-Smith in the preparation of their testimonies in this docket.

OCA/USPS-155. Please provide copies of every document relating to mail processing data collection that is available to Postal Service data collectors, supervisors, managers, planners, In-Plant Support personnel, or Operations Support personnel.

OCA/USPS-156. Please refer to the response to interrogatories OCA/USPS-12(a) and 13(a).

a. For each piece of equipment identified in those responses, please provide copies of all documents relating to its staffing, supervision, maintenance, or operation.

b. For each operation identified in those responses, please provide copies of all documents relating to the activities of employees and their supervisors engaged in that operation.

OCA/USPS-157. Please refer to the attachment to the response to Interrogatory POSTCOM/USPS-T39-10. Please provide National Actual Performance data for all Labor Distribution Codes (LDCs) (not just flats) for FYs 1996 through 2001 by FY by AP by LDC.

OCA/USPS-158. Please provide current copies of all documents relating to standard operating procedures for any mail processing operation.

OCA/USPS-159. Please refer to the response to Interrogatory OCA/USPS-21(f).

a. Please explain why no data are available.

b. Are there LDC or MODS codes for "handwriting recognition" equipment? If so, what are those codes?

c. Please provide any available data on volumes processed through "handwriting recognition" equipment for FYs 2000 and 2001. To the extent possible, please provide breakdowns by FY by PQ by AP by shape by subclass.

OCA/USPS-160. Please define the terms "clearance time," "critical entry time," and "dispatch of value." Please describe the relationships between these terms and explain how they are determined for a specific plant.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

h'Enri Whitsey Johnson

Washington, D.C. 20268-0001
October 25, 2001