

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-161-166)  
October 26, 2001

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

Respectfully submitted,



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OCA/USPS-161. 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 paid a First-Class rate. However, one group weighs one ounce and the other group weighs two ounces.

- a. Assume further that the two groups of letter-shaped pieces are processed in one pass on the same Delivery Bar Code Sorter (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 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 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.
- f. 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 confirm, please explain.
  - g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a Mail Processing Bar Code Sorter (MPBCS) and a Carrier Sequencing Bar Code Sorter (CSBCS), respectively. If you do not confirm, please explain.
  - h. Please confirm that the responses to parts a. through g. 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-162. 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 paid a Standard Mail Regular rate. However, one group weighs one ounce and the other group weighs two ounces.

- 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 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 DBCS would be the same. If you 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 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.
- f. 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 confirm, please explain.

- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. 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-163. 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 and barcoded. However, one group weighs one ounce and paid a First-Class rate, and the other group weighs two ounces and 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 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 DBCS would be the same. If you 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 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.
- f. 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 confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. 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.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class rate weighed two ounces and the group

that paid the Standard Mail Regular rate weighed one ounce. If you do not confirm, please explain.

OCA/USPS-164. Please refer to the response to OCA/USPS-42(b).

- a. Please confirm that barcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate are typically processed separately until processing into Delivery Point Sequence (DPS). If you do not confirm, please explain.
- b. Please confirm that prebarcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate are typically processed separately until processing into DPS. If you do not confirm, please explain.
- c. Please confirm that for processing into DPS, barcoded and prebarcoded letter-shaped pieces consisting of pieces paying a First-Class letter rate and a First-Class card rate become commingled only on the second DPS pass. If you do not confirm, please explain.

OCA/USPS-165. 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 letter rate and the other group paid a First-Class card 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 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 confirm, please explain.
  - i. Please confirm that the responses to parts a. through h. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
  - j. Please confirm that the responses to parts a. through i. 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-166. . 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 and barcoded. However, one group weighs one ounce and paid a First-Class card rate, and the other group weighs two ounces and paid a First-Class letter 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

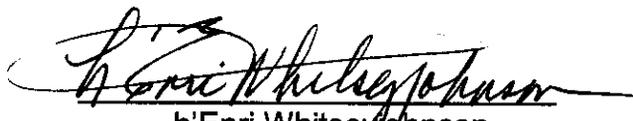
identify and describe all factors that would cause the throughputs and velocities for each group to differ.

- 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 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 DBCS would be the same. If you 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 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.
- f. 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 confirm, please explain.

- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a MPBCS and a CSBCS, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. 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.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class card rate weighed two ounces and the group that paid the First-Class letter rate weighed one ounce. If you do not confirm, please explain.

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 26, 2001