

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-167-171)
October 31, 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-167. Please refer to the response to OCA/USPS-63.

- a. Refer to the response to part a. Please confirm that "letters with insufficient addresses" generally enter the postal system as collection mail. If you do not confirm, please explain.
- b. Refer to the response to parts b. and d.
 - i. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered with the Postal Service via "Retail acceptance personnel;"
 - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of total First-Class letter-shaped mail that is entered via "Retail acceptance personnel;"
 - iii. For the base year and test year, please provide the total volume, or an estimate of the total volume, of mail entered via "Retail acceptance personnel."
- c. Refer to the response to parts b. and d.
 - i. Please identify methods other than "Retail acceptance personnel" by which First-Class letter-shaped mail is entered with the Postal Service;
 - ii. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered via each of the methods identified in subpart i.
- d. Refer to the response to part b. Please confirm that "culling equipment" refers to the Advanced Facer Canceler System (AFCS). If you do not confirm, please explain.

- e. Refer to the response to part b. Please confirm that there is no feature of the AFCS specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- f. Refer to the response to part b. Please confirm that there is no feature of any other mail processing equipment specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- g. Refer to the response to part b. Please confirm that there is no feature of any mail processing equipment specifically designed to separate letter-shaped pieces that are subject to the proposed nonmachinable surcharge from the letter-shaped mailstream. If you do not confirm, please explain.
- h. Refer to the response to part b. In what mail processing operation are "culling belts" located? Are culling belts a part of, or separate from, any mail processing equipment? Please explain how culling belts separate letter-shaped pieces destined for manual processing from the letter-shaped mailstream.
- i. Refer to the response to part b. Please confirm that culling belts are not capable of separating letter-shaped pieces subject to the proposed nonmachinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how the culling belts accomplish this separation.
- j. Refer to the response to part b. Please confirm that as "mailhandlers cull manual letters from the collection mailstream," they will not separate letter-shaped pieces

subject to the proposed nonmachinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain.

- k. Refer to the response to part b., where it states that letter-shaped pieces “can be diverted to the manual mailstream once . . . sorted to reject stackers.” Please confirm that the automation equipment will not separate letter-shaped pieces subject to the proposed nonmachinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how this separation is to be accomplished by the automation equipment.
- l. Refer to the response to part b., where it states “As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters.” Please confirm that full trays of manual letters from bulk mailers will be marked for manual processing pursuant to DMM section M130.1.5. If you do not confirm, please explain.
- m. Refer to the response to part b., where it states “As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters.” Please confirm that the full trays of manual letters arriving from other processing facilities will not be separated into trays of nonmachinable letter-shaped pieces subject to the proposed surcharge and trays of other manual letter-shaped pieces. If you do not confirm, please explain.
- n. Refer to the response to part b., where it states “As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters.” Please confirm that within the full

trays of manual letters arriving from other processing facilities, the letters will not be separated into nonmachinable letter-shaped pieces subject to the proposed surcharge and other manual letter-shaped pieces. If you do not confirm, please explain.

- o. Refer to the response to part c., where it states that "the Test Year After Rates volumes include an estimate of the additional pieces meeting the proposed nonmachinable definition." What proportion of the difference between the Base Year and Test Year After Rates volumes for nonstandard/nonmachinable First-Class Single-Piece and Nonautomated Presort Letters is nonmachinable (as opposed to nonstandard)?
- p. Refer to the response to part d. Where nonstandard/nonmachinable letter-shaped pieces are not identified by "Retail acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing and determined to be nonmachinable and subject to the proposed nonmachinable surcharge. Please explain how the determination is to be made.
- q. Refer to the response to part d. Where nonstandard/nonmachinable letter-shaped pieces are not identified by "Business Mail Entry Unit (BMEU) acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing RBCS; Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing

and determined to be nonmachinable and subject to the proposed nonmachinable surcharge. Please explain how the determination is to be made.

- r. Refer to the response to parts f. – j., where it states that “Pieces originally determined to be machinable at the retail window or BMEU but determined subsequently to be nonmachinable during processing, are intended to be treated similar to the existing nonstandard surcharge pieces.” Please confirm that some “existing nonstandard surcharge pieces” are currently processed successfully through the entire automated mail processing system. If you do not confirm, please explain.
- s. Refer to the response to parts f. – j.
 - i. Please provide the base year volume, or an estimate of the volume, of “existing nonstandard surcharge pieces” that are currently processed successfully through the entire automated mail processing system;
 - ii. For the base year, please provide the percent, or an estimate of the percent, of “existing nonstandard surcharge pieces” that are currently processed successfully through the entire automated mail processing system.
- t. Refer to the response to parts f. – j., where it states that “processing personnel assume the pieces have been appropriately charged at entry and will not be marked ‘Postage Due.’” Please confirm that only retail and BMEU acceptance personnel will mark Postage Due on letter-shaped pieces subject to the proposed nonmachinable surcharge. If you do not confirm, please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing

Primary, Carrier Delivery, etc.) where letter-shaped pieces will be marked Postage Due.

- u. Refer to the response to parts f. – j., where it states that “processing personnel assume the pieces have been appropriately charged at entry and will not be marked ‘Postage Due.’” Please confirm that if letter-shaped pieces subject to the proposed nonmachinable surcharge are not identified at the retail window or BMEU, such letter-shaped pieces will not pay the proposed nonmachinable surcharge. If you do not confirm, please explain.
- v. Refer to the response to parts f. – j.
 - i. Please provide the base year and test year volume, or an estimate of the volume, of nonstandard/nonmachinable letter-shaped mail that is marked Postage Due;
 - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of nonstandard/nonmachinable letter-shaped mail that is marked Postage Due;
 - iii. Please provide the base year and test year volume, or an estimate of the volume, of manual letter-shaped mail that is marked Postage Due;
 - iv. For the base year and test year, please provide the percent, or an estimate of the percent, of manual letter-shaped mail that is marked Postage Due.
- w. Refer to the response to parts f. – j. Please confirm that because not all nonstandard/nonmachinable letter-shaped pieces will be identified by retail and BMEU acceptance personnel, the Test Year After Rates revenue estimates for

the proposed nonmachinable surcharge are overstated. If you do not confirm, please explain.

OCA/USPS-168. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded, and weighs two ounces. 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 flat-shaped pieces are processed in one pass on the same Advanced Flat Sorting Machine (AFSM) 100. 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 AFSM 100 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 flat-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 3 ounces.
- f. Assume the same facts above and in part a., except that each flat-shaped piece in each group weighed 4 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 4 ounces.
- g. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a. through f. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- h. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. 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 AFSM 100. 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 were processed on a Flat Sorting Machine (FSM) 881 and a Flat Sorting Machine (FSM) 1000, 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 flat-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-169. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a First-Class rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. 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 AFSM 100 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 flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. 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 AFSM 100. 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 FSM 881 and a FSM 1000, 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 flat-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-170. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a Standard Mail Regular rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. 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 AFSM 100 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 flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. 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 AFSM 100. 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 FSM 881 and a FSM 1000, 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 flat-shaped pieces, respectively. If you do not confirm, please explain.

OCA/USPS-171. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible and barcoded. However, one group weighs two ounces and paid a First-Class rate, and the other group weighs three ounces and paid a Standard Mail Regular rate.

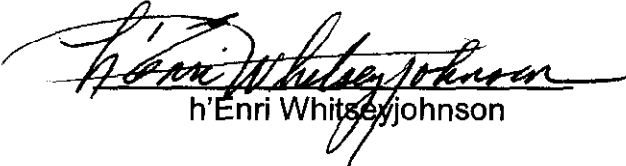
- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs 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 AFSM 100 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 flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. 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 AFSM 100. 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 FSM 881 and a FSM 1000, 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 flat-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 three ounces and the group that paid the Standard Mail Regular rate weighed two ounces. 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 31, 2001