

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

RECEIVED  
Oct 31 4 52 PM '01

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 INTERROGATORIES OF  
OFFICE OF CONSUMER ADVOCATE  
OCA/USPS-91(a-g), 93 (a) and (b), and 94

The United States Postal Service hereby provides the responses of witness Bozzo to the following interrogatories of Office of Consumer Advocate: OCA/USPS-91 (a-g), 93 (a) and (b), and 94 filed on October 25, 2001. These interrogatories were redirected to witness Bozzo from the Postal Service.


Each 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

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-4823; Fax -5402  
October 31, 2001

**Response of United States Postal Service Witness Bozzo to Interrogatories of  
the OCA (Redirected from the United States Postal Service)**

OCA/USPS-91. Please refer to page 7, lines 13 and 21, of the testimony of witness A. Thomas Bozzo, USPS-T-14.

- a. Please define the word "plant" [sic] as used at line 13.
- b. Please provide a list of plants that meet this definition.
- c. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part b, above.
- d. Please define the word "plant" [sic] as used at line 21.
- e. Please provide a list of plants that meet this definition.
- f. For FYs 1993 through 2001, please provide an inventory of mail processing equipment at each plant listed in response to part e, above.
- g. Do witnesses Bozzo and Kingsley use the word "plant" consistently both within and between their testimonies? If not, please identify and define all other uses of the word "plant" and provide responses to parts b-c, above, for each definition.

OCA/USPS-91 Response.

- a. As used at page 7, line 13, of USPS-T-14, the word "plants" refers to four Processing and Distribution Centers (P&DCs) I visited.
- b. The plants in question have site ID numbers 78, 149, 195, and 205 in the data sets supplied in LR-J-161.
- c. The requested data will be provided in LR-J-161, file equipment.xls.
- d. As used at page 7, line 21, of USPS-T-14, the word "plants" refers to the two P&DCs that supplied the data presented at pages 31-32 of witness Kingsley's testimony, USPS-T-39.
- e. The plants in question have site ID numbers 82 and 83 in the LR-J-161 data sets.
- f. Please see the response to part (c), above.
- g. Yes, though note that in other instances in USPS-T-14, I use the term "plant" generically to refer to P&DCs and Processing and Distribution Facilities (P&DFs). Also, it is my understanding that while witness Kingsley's predominant use of the term is in reference to P&DCs and P&DFs, there may

**Response of United States Postal Service Witness Bozzo to Interrogatories of  
the OCA (Redirected from the United States Postal Service)**

be a case in which the term could refer (in appropriate context) to Bulk Mail  
Centers.

Response of United States Postal Service Witness Bozzo to Interrogatories of  
the OCA (Redirected from the United States Postal Service)

OCA/USPS-93. Please refer to page 47, lines 6-8, of the testimony of witness A. Thomas Bozzo, USPS-T-14. Witness Bozzo states:

Manual operations serve as "backstops" to automation to deal with machine rejects and machine capacity shortfalls . . . .

- a. Please define the term "backstops."
- b. Please define the term "capacity shortfalls."

OCA/USPS-93 Response.

- a. The term "backstops," as used in the quoted statement, is a colloquialism referring to the role of manual operations in providing productive capacity for processing automation compatible (or machinable) mail that cannot be successfully processed in automated (or mechanized) operations—i.e., for machine rejects and/or machine capacity shortfalls. See also Docket No. R97-1, USPS-T-14 at page 58, lines 5-17.
- b. The term "[machine] capacity shortfalls," as used in the quoted statement, refers to the situation in which the volume of mail available to be processed in a given automated (or mechanized) operation in a given interval of time exceeds the maximum volume of mail that the operation is capable of processing in that interval of time.

**Response of United States Postal Service Witness Bozzo to Interrogatories of  
the OCA (Redirected from the United States Postal Service)**

- OCA/USPS-94. For FYs 1999, 2000, 2001, and 2002, please provide
- a. volumes by PQ and AP by plant by mail processing cost pool
  - b. workhours by PQ and AP by plant by mail processing cost pool.

OCA/USPS-94 Response.

a.-b. The requested data will be provided in LR-J-161, file MODS.xls. Please note that plant workhours by AP, plant, and mail processing cost pool are available only for MODS facilities. The provided "volumes" by AP, plant, and mail processing cost pool are MODS TPH for the cost pools associated with LDCs 11-15 and for the Cancellation and Metered Mail Prep cost pool (1CANCMPP) in LDC 17. Cost pool-level volumes are not available for other cost pools. MODS operation numbers have been mapped to cost pools using Table I-2B, LR-J-55. The most recent available data are from AP 1 of FY 2002.

**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 31, 2001

**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.

  
\_\_\_\_\_  
Frank R. Heselton

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
October 31, 2001