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

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001–1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS–86(a), 89-90, 91(h-l), 92, 93(c-j), 95-98)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS–86-98, filed on October 17, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-86 Please refer to the testimony of witness Maura Robinson (USPS-T-29), Attachments A-F.

a. In Attachment F, column (2), line (a), there appears the figure, 24.45%, which has a citation to USPS LR-J-60 at page 50. Please provide a cell reference in USPS LR-J-60 at page 50 for this percentage.

RESPONSE:

(a) The following calculation can be used to derive the 24.45% figure using data found in USPS LR-J-60, page 50.

24.45% = (Cells G37 + G41 + G46 + G47+ G51) / (Cells E7 + E18 + E33)

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-89

a. In the Outgoing Primary (Auto) operation, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are

(1) First-Class letters,
(2) First-Class cards,
(3) Standard Mail letters,
(4) Standard Mail cards.

b. In the 5-Digit Barcode Sort, for the DBCS equipment, what proportion of the total letter-shaped pieces processed are

(1) First-Class letters,
(2) First-Class cards,
(3) Standard Mail letters,
(4) Standard Mail cards.

c. In the 5-digit Barcode Sort, for the MPBCS equipment, what proportion of the total letter-shaped mail pieces processed are

(1) First-Class letters,
(2) First-Class cards,
(3) Standard Mail letters,
(4) Standard Mail cards.

RESPONSE:

Please see the responses to OCA/USPS-39 and 40.

(a) All letters and cards are processed in either a DIOSS or DBCS outgoing primary operation using MODS operation numbers 291 or 891, regardless of the shape and subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(b) All letters and cards are processed in either a DIOSS or DBCS 5-digit barcode sort operation using MODS operation numbers 293/4/5 or 893/4/5 regardless of the shape and subclass. In addition, these operations numbers are also used nationwide for the incoming managed mail program, incoming SCF, and incoming primary operations. Consequently, the Postal Service does

REPONSE TO OCA/USPS-89 (CONTINUED)

not have disaggregated volume data as requested.

(c) All letters and cards are processed in either a MPBCS or MPBCS-OSS 5-digit barcode sort operation using MODS operation numbers 873/4/5 or 973/4/5, regardless of the shape and subclass. In addition, these operations numbers are also used nationwide for the incoming managed mail program, incoming SCF, and incoming primary operations. Consequently, the Postal Service does not have disaggregated volume data as requested.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-90

a. In the Outgoing Primary (Piece) operation, for the AFSM100 Auto equipment, what proportion of the total flat-shaped pieces processed are

(1) First-Class flats,
(2) Periodicals flats,
(3) Standard Mail flats.

b. In the Outgoing Primary (Piece) operation, for the FSM881 Auto equipment, what proportion of the total flat-shaped pieces processed are

(1) First-Class flats,
(2) Periodicals flats,
(3) Standard Mail flats.

c. In the Outgoing Primary (Piece) operation, for the FSM1000 Auto equipment, what proportion of the total flat-shaped pieces processed are

(1) First-Class flats,
(2) Periodicals flats,
(3) Standard Mail flats.

RESPONSE:

Please see the responses to OCA/USPS-39 and 40.

(a) All flats classes are processed in an AFSM100 outgoing primary operation using MODS operation number 331, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(b) All flats classes are processed in a FSM881 outgoing primary operation using MODS operation number 421, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

(c) All flats classes are processed in a FSM1000 outgoing primary operation using MODS operation number 441, regardless of the subclass. Consequently, the Postal Service does not have disaggregated volume data as requested.

RESPONSE OF UNITED STATES POSTAL SERVICE
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OCA/USPS-91. Please refer to page 7, lines 13 and 21, of the testimony of witness Thomas Bozzo, USPS-T-14.

a. Please define the word "plant" 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" 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.

h. Who decides how many pieces of each type of mail processing equipment should be placed in a particular plant?

i. Please provide copies of all instructions or other documents that explain how to determine how many pieces of each type of mail processing equipment should be placed in a plant.

Response:

a. – g. Redirected to witness Bozzo.

h. The decision is made in consultation between Headquarters Engineering, Headquarters and Area Operations management, and the management of the particular plant.

i. Each purchase of mail processing equipment involves a separate "requirements call". These calls are developed by Engineering and are unique to each equipment purchase. They generally require justification for the equipment in terms of volume, workhours, operating plan, etc. as appropriate to the purchase,

but can be much simpler (e.g. one unit for each plant with a specific type of equipment).

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

OCA/USPS-92 Please refer to page 29, lines 18-26, of the testimony of witness Linda A. Kingsley, USPS-T-39. Witness Kingsley states:

> Each plant must sort mail to a network of other plants, post offices, carrier routes, box sections, large firms, etc. This network is a major determinant of the plant's workload. In conjunction with the characteristics of the mail and the sorting equipment, this network determines the sort schemes that must be spread over the equipment. The work required to service the network can sometimes be distinguished from the work of processing mail volumes. This is seen most dramatically following a rate increase. Volume, and the workload required to process that volume, may decline, but the number of separations required for the network is unaffected.

a. Do all sort schemes utilize all possible separations on a given piece of equipment? If not, why not?

b. Are there "marginal" separations in some sort schemes? That is, are there separations with so much or so little volume that an increase or decrease in volume for those separations would lead to creation or consolidation of separations? If not, why not?

c. Who creates sort schemes for a particular plant?

d. Please provide copies of all instructions or other documents that explain how to create sort schemes.

e. Are there "marginal" stackers on some bar code sorters? That is, are there stackers with so much or so little volume that an increase or decrease in volume for those stackers would lead to one more or one less tray's being generated by those stackers for a particular run? If not, why not?

f. Please provide copies of all instructions or other documents that explain how to sweep stackers.

Response:

a. No. However, on primary schemes, all separations would be used. On secondary schemes, both outgoing and incoming, the count of separations required to service the network generally will not match the number of stackers available. Holdouts for recipients of large volumes of mail (i.e. "firms") may be established to utilize some of the excess stackers, but this possibility is generally quite limited and inadequate to exhaust the available stackers. Similarly, in Delivery Point

Sequencing (DPS) schemes, the number of carrier routes and delivery points for the scheme are the drivers of stacker utilization and will not generally match the number of stackers on the sorter.

b. Yes. For example, there are seasonal separations associated with "snowbirds", income taxes, etc., and occasional separations to support foreign wars and other special requirements.

c. See response to OCA/USPS-48g.

d. See response to OCA/USPS-48g.

e. Yes. The normal variation in day-to-day mail volume would cause some variation in the number of trays produced by many stackers, especially in primary schemes. However, many stackers required to service the network consistently produce less than one tray.

f. Copies of the pages with sweeping instructions from various manuals are attached. These extracts cover the FSM 1000, FSM 881, DBCS, SPBS, and AFCS.

attachment to UCA/USPS-92-5 Pl. of 11.

USPS	WORK INSTRUCTION AFSM 100 SWEEPER OPERATIONS	W# W-AF567	Revision # 0	Process Owner: Manager, Processing Operations

1) **PURPOSE:** To effectively sweep the AFSM 100 so as to optimize its productivity.

2) **SCOPE:** All personnel performing or supervising sweep operations in standardized AFSM 100 processes.

3) **PERFORMANCE METRICS:**

PERFORMANCE CATEGORIES:	PERFORMANCE TARGETS:
Changeover duration:	9 minutes max. OCR mode

4) **WORK INSTRUCTION CONTENT:**

Perform the following Activities:

- Obtain labels from label station and place them into appropriate slots above the flat trays (verify label and stacker numbers match).
- Ensure there is a flat tray at every discharge chute (and that each is properly labeled).
- Remove full mail trays, place on takeaway conveyor (avoid pulling trays that are less than two thirds full). An amber light will flash above flat tray indicating when it is full. Failure to remove the full tray will have a negative impact on productivity and throughput since the mail will recirculate until full tray is pulled.
- Immediately replace swept tray with a correctly labeled empty tray.

  NOTE: The status indicator light stays solidly lit when a tray is removed until it is replaced. Mail will recycle in the machine until the tray is replaced or it times out. Throughput is affected when excessive time is used to remove/replace full trays.

- A full sweep at the end of the run should take a maximum of 9 minutes (OCR mode).
- Replenish labels from label station as necessary.
- Notify supervisor if label stock at label station needs replenishing.
- Remove all mail piece jams on the AFSM 100 per W-AF125.

CHANGEOVER: **Performed per W-AF124, "AFSM 100 End of Run/Sort program Changeover"**

these trays without disrupting the movement or rhythm of the keyer.

581.324 *Riffling*

Riffle mail during loading to identify mail that runs (all for one separation or ZIP Code). Remove this mail and send it to manual cases or the tie out area to be bound and dispatched to prevent feeding mail that is stuck together.

581.4 Mail Supply (Utility Cart/Truck, Etc.)

Place mail supplies to minimize walking. Place at least one supply truck close to Consoles #1 and #2, and Consoles #3 and #4. Keep the loading aisle narrow. Aisles three feet wide allow for safe movement and keep travel distance short.

581.5 Sweeper Duties

581.51 Bins

Withdraw and verify mail from the bins, as scheduled. Empty full bins immediately. Avoid premature (uneconomical) sweeping, except when dispatches are necessary. Check low-density bins periodically. Verify designated separations; remove errors and uncancelled mail. Properly prepare errors removed for further distribution. If excessive errors are detected, advise the supervisor immediately.

581.52 Trays

FSM 881 trays are designed for quick removal. When a tray is full, replace it with an empty one. Take the full tray to the transfer point or dispatch area. Stack trays prepared for dispatch properly to prevent their falling from transport equipment. Use approved and safe techniques. The sweeper is responsible for labelling trays as they are replaced.

581.6 Clearing Jams

Follow the procedures below to clear jams:

a. Set the emergency stop button prior to entering the machine area to clear a jam. Most jams are cleared by sweepers unless occurring in the feeder section. When a jam occurs, the pusher finger pivots in the opposite direction to the transport belt travel.

b. Return the pusher finger to the original position by removing the object causing the jam. To remove a mailpiece without damaging it, it is advisable to move the piece in a backward direction, allowing any part caught on the finger to slide off. A jerking motion forward or straight up may cause additional damage.

c. Reset the EMERGENCY STOP button.

d. Give the all clear signal for restart.

581.61 Feeder Section

581.611 *Locating the Jam*

Jams occur in the feeder section when a piece obstructs finger travel soon after insertion. Often, these happen in the area of the feed station immediately in front of the operator who keyed the piece. As a jam occurs, the red light on top of the machine directly opposite the keyer lights up. A jam is sometimes accompanied by an audible snap as the pusher finger pivots. This also helps to locate the jam area, as the red light goes out if the jam clears itself.

581.612 *Clearing the Jam*

To clear the jam:

a. Push the EMERGENCY STOP.

b. Lift the blue doors of the induction station where the jam is located.

c. If the jammed flat is accessible, remove it. If the jam is directly behind the feeder assembly, swing out the feeder assembly and remove the flat.

d. Swing the feeder assembly back into place, if necessary.

e. Close the blue doors.

f. Reset the EMERGENCY STOP button.

g. Give the all clear signal for restart.

581.62 Bins Section

581.621 *Locating the Jam*

Most bin section jams occur at Bins #1 and #51 due to a change in the angle of the deflection from the feeder sections. Clear the jam by releasing the obstructed pusher finger. Use slightly backward sliding motion to prevent damage to the mailpiece.

581.622 *Clearing the Jam*

To clear the jam:

a. Set the EMERGENCY STOP.

b. Remove the bin closest to the jam.

c. Step into the vacated bin area.

d. With the left hand, relieve the pressure by pulling the pusher finger to the left.

e. With the right hand, remove the flat.

f. Replace the pusher finger without letting it snap.

g. Safely step out of the bin area and replace the bin.

in the feeder), the system will not know there is another flat in the feeder. In this case, the operator may notice that the system didn't induct the mailpiece (the system doesn't know it's there) and wonder what the problem is. In early testing, operators learned to momentarily block the sensors to cause the system to induct the mailpiece. This action will work and will cause the "short" mailpiece to be inducted correctly assuming the keycode was correctly entered. If the short mailpiece isn't noticed, the operator will likely key the next mailpiece and slide it in on top of the existing piece, causing both to go to the same destination.

The problems associated with dropping too soon (before the first flat has cleared the feeder and the feeder belt has stopped) can be alleviated by using the READY lamp on the operator control panel as a visual cue. This lamp indicates that the feeder is ready to accept the next mailpiece. It is especially important to use this cue when operators are unfamiliar with the FSM 1000. As they become more experienced, they will get in synch with the system and rely less on the visual cues provided by the operator indicator panel.

3.7 SWEEPING MAIL

Sweeping is a manual function that personnel are required to perform during machine operation. The sweeping function ensures that empty tubs are placed at the machine outputs and that the full tubs are removed from the work area.

Mail sweeping is facilitated by two Takeaway Conveyor systems (one on each side of the machine) which operate independent of each other. The Takeaway Conveyor system is a set of conveyors under the Dual Chutes that runs the entire length of the Output Units. A Beam Of Light (BOL) is mounted to detect when a tub is placed onto the conveyor. This BOL projects down the entire length of the Output Units. There is a separate BOL and Takeaway Conveyor for each side of the machine. The BOL is interrupted when a tub is pushed onto the Takeaway Conveyor. When the BOL is interrupted, the conveyor belt stops. A few seconds after the full tub is fully placed on the belt and the beam is cleared, the conveyor system will activate and run for the time necessary to take the full tub to the end of the machine, up the Incline Conveyor, and onto the gravity Skatewheel Conveyor. At the end of the conveyor system, another conveyor (Incline Takeaway Conveyor) moves the tubs up to an expandable Skatewheel Conveyor. A BOL mounted at the top of the Incline Conveyor is used to detect when the Skatewheel Conveyor is full. The Skatewheel Conveyor can hold approximately 14 tubs in its fully expanded configuration.

The Incline Takeaway Conveyor has an E-STOP push-button for safety. Both of the Incline Takeaway Conveyors have a post with a red lamp and a blue lamp. The red lamp indicates that the Incline Conveyor E-STOP switch was activated. The blue lamp indicates the Skatewheel Conveyor is full. When the Skatewheel Conveyor is full because of a blocked BOL, the Takeaway Conveyor is prevented from bringing more full tubs to the Incline Conveyor. Therefore, the Skatewheel Conveyor should be kept clear to ensure that the Takeaway Conveyor is not prevented from movement as necessary to accept full tubs.

attachment to OCA/USPS-92-9
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WARNING

Do not reach into the main transport path (e.g., clearing out foreign objects or a jammed mailpiece) while the machine is running.

Sweeping responsibilities include the following:

1. Load pre-printed destination labels into the Label Holders by matching the label text to the LCD Display text.

2. Visually check output chutes and tubs to ensure no mail buildup occurs.

3. Respond timely to output tubs requiring service by visually checking to see if they are full.

4. Remove and replace tubs when full. You should perform this when the tubs contain mail which is near the bottom of the tub handles openings. Do not let mail stack up to the point where it is to the top of the tub.

    a. Have an empty tub ready and attach a destination label.

    b. When there is a sufficient opening for a tub on the Takeaway Conveyor belt, move the full tub forward onto the automated Takeaway Conveyor by pushing firmly on the empty tub located behind it. If an empty tub is not present, a direct push on the rear of the full tub may be necessary.

    c. Replace the vacated spot with an empty labeled tub.

5. Verify the tub follows the Takeaway Conveyor up the Incline conveyor to the Skatewheel Conveyor by occasionally monitoring its movement along the conveyor.

6. Prevent the tubs from blocking the Incline Takeaway Conveyor BOL by promptly removing the full tubs from the Skatewheel Conveyor. (A blocked BOL prevents the Takeaway Conveyor system from operating.)

At the completion of a run, clear the system (by pushing tubs onto the conveyor) of partially full tubs starting at the Incline Conveyor end of the system. This will prevent interference with tubs coming down the Takeaway Conveyor.

NOTE

Proper orientation of mail stacks on the conveyor is considered a shared responsibility of the keyer and loader. Although it is important that mail stacks be oriented correctly, the loader cannot neglect his/her other duties. Therefore, the keyer may at times have to orient the stacks.

Step 4. Keying/Feeding

- Keycode mail using the keying methods demonstrated by your instructor.
- Ensure that you practice the use of the ENTER key (2-digit on FSM 881) function. Your instructor will check to make sure you understand this function.
- Use the correct feeding rules:
  - Seam Down
  - Fold Forward
  - Long Side Down
- Clear jams if they occur.

Step 5. Sweeping

- Watch for "full" tubs (your instructor may ask you to sweep the mail before they are actually full).
- Ensure the tubs are properly positioned on the Takeaway Conveyor.
- Ensure labeled empty tubs are placed in position.
- Clear jams if they occur.

Step 6. Jam Clearing and Emergency Stop

Each student will perform the procedure to clear a jam in the output area and at the Input station. Also, the instructor will ask each student to perform an Emergency Stop while this exercise is being performed. **If you did not have an opportunity to perform jam clearing during your practice, ask your instructor to create (or simulate) a jam for you.**

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Attachment to OCA/USPS-92
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3.3 SWEEPING OF MAIL RECEPTACLES

The information in this section describes the general functions and operations to be performed by the sweep attendant. Sweeping involves the physical act of replacing a mail container that has reached its preset weight limit (full) with an empty container. (Maximum weight limits for each output bin are defined as part of the sort plan generation at initial startup.)

3.3.1 CONDITIONS REQUIRING SWEEPING

- Full trays – by weight (visual/audio aids)
- Full sacks – by weight (visual/audio aids)
- Full sacks – by volume (no aids provided; visual observation required)
- Full wiretainers – by volume (no aids provided; visual observation required)
- Full wiretainers – by weight (visual/audio aids)
- Full U–carts – by weight (visual/audio aids)
- Full U–carts – by volume (no aids provided; visual observation required)
- Full reject bin container (no aids provided; visual observation required)
- Full overflow container (no aids provided; visual observation required)

WARNING

To prevent personal injury, sweeping of overflow container (located inside rear of Drive Module) is performed only while main drive chain is not running.

3.3.2 SWEEPING AIDS

- Bin Full Indicator – an indicator located on top of the output control arm assembly.
  - Light On – container has reached 75% of weight limit and must be replaced (swept). Mail will continue to be sorted to bin until weight limit is reached.
  - Flashing Light (accompanied by a momentary audio alarm) – container has reached 98 to 100% of its weight limit and requires immediate replacement. Mailpieces will continue to be sorted to bin if the addition of the mailpiece does not put the container over 100% of its weight limit. Mailpieces will then be diverted to the reject bin.
- SWEEP Button/Indicators (left and right) – located on output control arm assembly.
  - When button is pressed once, SWEEP indicator lights (amber) and Bin Full indicator light flashes (red) to indicate a bin full condition and sweeping operation in progress. Mail is now diverted to the reject bin while container is being exchanged. SWEEP button must be pressed again after container is exchanged to allow sorting to bin.
  - When button is pressed again, the SWEEP and Bin Full indicators will go out. Mail will resume sorting to the associated bin.

SPBS P2 of 2 Attachment to OCA/USPS-92S P7 of 11

3.3.3 SWEEPING OPERATIONS

Sweep attendant responsibilities are as follows:

- Quickly respond to output bins requiring service, as indicated by audio and visual alarms.
- Visually check output chutes and containers to ensure no mail buildup occurs.
- Visually scan all output receptacles. Remove and replace when full.

The sweeping procedure for replacing all of the output container types is basically the same, as follows:

1. Replace as dictated by audio/visual alarms.
2. Replace as a result of dispatch schedules.
3. Replace as a result of visual observation of container full condition.
4. On output control arm assembly, press appropriate SWEEP button (left or right). SWEEP indicator will light. (Mail is diverted to reject bin.)
5. Remove full container. Replace with empty container.
6. Press SWEEP button a second time to clear bin weight to zero and allow sorting of mail to associated output bin. SWEEP indicator and Bin Full indicator will go off.

1. Feet spread comfortably to give balance and stability.

2. Knees bent and back straight, "nearly" vertical.

3. Keep head upright and moving freely to assist in maintaining balance.

4. When raising up, keep the back straight.

5. If turning is necessary, use the feet as a pivot point. Do not twist the body trunk.

If necessary, use the steps on the machine to assist you in reaching the upper stackers. Do not use the steps to walk the length of the DBCS because this is an unsafe procedure. Always remember to return the steps to the upright position once the upper stacker has been swept.

When sweeping a second pass sort, use the same procedure as those just reviewed. Remember that keeping your mail in sequential order is critical to the success of the DPS operation.

Staging Methods

First Pass

The method of staging processed mail on the first pass is directly related to the type of tray racks utilized on the DBCS.

6. Place the mail into the proper mail tray with both hands. The mail must be placed into the trays with the addresses facing away from the DBCS machine.

7. Place new mail in the trays behind the existing pieces being careful to keep the mail in proper sequence for the carriers.

8. Place full trays in the appropriate container for subsequent processing or dispatch.

9. Press the label print button, slide the label in the new tray and place it on the tray support equipment.

10. Monitor the stacker indicators for faults. When a fault indicator lights up, the SMP should follow the TOPS/OSRM corrective procedures.

11. Monitor the stacker indicators for jams. A jam light comes on to indicate a jam in the same stacker module. The loader should assist the sweeper in identifying the location of a jam as well as full stackers by using the status line on the DBCS computer monitor.

When sweeping mail from lower stacker levels, always use proper bending techniques. Proper bending techniques are as follows:

Check all stackers frequently and remove the mail before the 75% indicator light flashes. As the sweeper gains experience it will become evident when a stacker should be swept.

1. Position yourself in front of a stacker that is close to 60% full. Mail in the stacker will have the address facing the sweeper.

2. Pull out the proper shelf on the 1226F tray cart. Only extend the shelf drawer out as far as needed to place the mail in the tray. The shelf does NOT need to be fully extended.

3. Raise the stacker paddle with your right hand using the hole in the paddle. Support the mail with your left hand to prevent it from tilting.

4. Reinsert the paddle into the stack of mail near the mail guide. Leave 2 inches of mail at all times when sweeping the stackers, except at dispatch time. This is a necessary safety precaution. Do not completely empty a stacker when the machine transport belts are moving.

5. Remove the mail using your left hand to support the front of the mail and your right hand from in front of the paddle. Turn by moving your feet, not just rotating your body.

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SWEEPING PROCEDURES FOR THE DBCS

The primary activity of the sweeper is to clear mail from the stackers and place them into trays. Generally, stacker modules will be arranged so that the highest density stackers are grouped together. These high density stackers are usually located near the read reject stacker (customary stacker #1). Stacker density generally decreases the farther away they are from stacker #1. This arrangement allows the sweeper to spend the majority of their time in front of a limited number of stackers while the DBCS is processing mail.

When an individual stacker reaches 75% capacity, a full warning light will flash. Mail will continue to be sent to this stacker. When the stacker has filled completely the light stops flashing and remains on and an audible alarm will sound. Depending upon the sort program options, mail destined for a full stacker may be directed to a bypass stacker or to the last stacker. If processing mail for the second pass of a two pass sort plan, the DBCS will stop processing mail. If any of the mechanical reject stackers become full the DBCS will stop processing mail. At such times, the machine will go into an idle mode and can be re-started when the full stacker has been emptied.

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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."

c. Does the Postal Service use manual operations to deal with machine breakdowns?

d. Does the Postal Service use manual operations to deal with unexpectedly large volumes?

e. How does the Postal Service meet critical dispatches when there is a "capacity shortfall"?

f. What are the operational consequences of a failure to meet a critical dispatch?

g. What are the consequences for managers or supervisors who fail to meet a critical dispatch?

h. What are the financial consequences to the Postal Service of a failure to meet a critical dispatch?

i. Please provide copies of all instructions or other documents that explain to managers or supervisors how to meet critical dispatches in the event of a "capacity shortfall" or unexpectedly large volumes.

j. Please provide copies of all instructions or other documents that explain to managers or supervisors how to plan for a "capacity shortfall" or unexpectedly large volumes.

Response:

a. Redirected to witness Bozzo.

b. Redirected to witness Bozzo.

c. They may on rare occasions. However, this would be very unusual for machinable mail processed in a facility where appropriate sorting machines are available because the mail would be diverted from the automation mail stream into more expensive manual processing for all subsequent operations. Instead,

the mail would be run on another machine or run late after the breakdown is repaired.

d. Certainly for unexpectedly large volumes of non-machinable mail. However, it would be unusual for machinable mail to be diverted to manual operations for the reason explained in part c above.

e. Mail might be diverted from a plant with a capacity shortfall to another plant. Within a single plant, every alternative that is both effective and not cost–prohibitive would be employed. For example, large Christmas cards are sometimes processed on a flat sorter.

f. Mail may not make the critical entry time at the destination, but still may be delivered on time. For example, it may meet a later truck or plane and still reach the destination (delivery unit or plant) in time for delivery within the service standards.

g. Disciplinary action may be taken if, in the opinion of their manager, the failures occur without adequate reason.

h. Facilities may incur additional costs for overtime or extra transportation to compensate for the failure.

i. Contingency plans are developed individually by each facility and are not available at the national level.

j. A copy of the Contingency Plan section from the AFSM 100 Support Guide is attached. We are not aware of any other documents on developing a contingency plan. Development of a Contingency Plan is a normal part of on-the-job training at individual plants.

attachment to OCA/USPS-93J

14.4 CONTINGENCY PLANS

In-Plant Support, in conjunction with other functional groups, must develop and coordinate contingency plans in the event of a situation that prevents the AFSM 100(s) from processing all the volume normally scheduled for AFSM processing.

It is highly unlikely that the entire AFSM 100 will be inoperable for any length of time outside of its normally planned maintenance windows. A more likely scenario that may force a facility to implement their contingency plan is either an AFSM Feeder or OCR malfunctioning, resulting in the machine working at less than full capacity. Another possible scenario is an unexpected heavy volume period that exceeds the plant's automation capacity during a specific processing window.

If the event is caused by an equipment malfunction, make sure the proper maintenance personnel are contacted immediately and determine as soon as possible what the estimated time will be to correct the problem.

A contingency plan must include a priority list of the types of mail that must remain on the AFSM 100 when the operational capacity is reduced unexpectedly. Also, when processing several different types of mail simultaneously using different sortplans, the contingency plan must spell out for the supervisors which AFSM 100 mail they would initially migrate from the AFSM 100 to another operation.

This targeted mailstream would either flow to another processing operation, or as a last resort processed at a later time, possibly on an available AFSM 100. Generally, the order of removing or migrating mail from the AFSM should be the following:

- Standard A
- Periodicals
- Newspapers
- First Class (undated)
- First Class (metered)
- First Class (stamp)

When flowing the targeted mailstream to an alternative operation, the order of preference should be FMOCR, FSM 1000 BCR, FSM 1000 Keying, and Manual. The objective is to move this mail to the least costly operation available while minimizing the affect on service.

If the unforeseen event affecting AFSM capacity occurs during Tour 1 operations, when most of the mail processed is First Class Incoming Secondaries, the contingency plan must clearly prioritize a list of those zones and sortplans that will be affected. The plan must specify where these zones will be processed (distribution operation, Function 1 or Function 4), when they will be processed and at what cost (use Cost Comparison Model to determine costs). This segment of the plan must be closely and carefully coordinated with Delivery Operations, other plant operations, and Transportation, if scheduling of trips are affected by the plan. Again, when considering strategy options, ensure the option chosen is the least costly option available and has the least affect on meeting service standards.

In order for contingency planning to work effectively, all functional areas affected by the event that triggered the contingency, must be notified immediately. The plan must include a list of contact names that must be notified.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-95. For FYs 1999, 2000, 2001, and 2002, please identify the PQs and APs that had the highest and lowest volume of

a. cards and letter-shaped pieces
b. flat shaped pieces
c. nonletter/nonflat-shaped pieces.

RESPONSE:

No data are available for FY 2002.

Cards and letter-shaped pieces

HIGH VOLUMES

1999 AP 5 11,256 million (M) pieces
2000 AP 7 12,210M
2001 AP 2 11,983M

1999 PQ 4 40,964M
2000 PQ 4 42,025M
2001 PQ 4 43,844M

LOW VOLUMES

1999 AP 13 10,018M
2000 AP 11 10,088M
2001 AP 13 10,638M

1999 PQ 3 32,730M
2000 PQ 2 34,073M
2001 PQ 3 35,046M

Flat shaped pieces

HIGH VOLUMES

1999 AP 2 3,818M
2000 AP 2 4,029M
2001 AP 2 4,466M

1999 PQ 4 12,758M
2000 PQ 4 13,369M
2001 PQ 4 13,418M

LOW VOLUMES

1999 AP 4 2,651M
2000 AP 4 2,924M
2001 AP 4 3,043M

1999 PQ 2 9,178M
2000 PQ 2 9,831M
2001 PQ 2 10,373M

Nonletter/nonflat-shaped pieces

HIGH VOLUMES

1999 AP 4 285M
2000 AP 4 315M
2001 AP 4 326M

1999 PQ 4 1,001M
2000 PQ 4 913M
2001 PQ 4 902M

LOW VOLUMES

1999 AP 11 233M
2000 AP 11 220M
2001 AP 13 217M

1999 PQ 3 753M
2000 PQ 3 749M
2001 PQ 3 725M

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA.USPS-96. For FYs 1999, 2000, 2001, and 2002, for the PQs and APs identified in the previous interrogatory [OCA/USPS-95], please provide the high or low volume of

a. cards and letter-shaped pieces
b. flat shaped pieces
c. nonletter/nonflat-shaped pieces.

RESPONSE:

See the response to OCA/USPS-95.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-97. Former Postmaster General Henderson spoke of the desirability of the Postal Service's offering seasonal rates.

a. Please describe all operational benefits that would accrue to the Postal Service from offering seasonal rates or discounts.
b. Please describe all operational benefits that would accrue to the Postal Service from offering peak-load rates or discounts.
c. Please describe all operational benefits that would accrue to the Postal Service from offering time-of-day rates or discounts.

RESPONSE:

a.-c. Differential seasonal, off-peak, and time-of-day rates have apparently proven beneficial in other industries, especially in industries (e.g., airlines, electric utilities) where the product or service cannot be inventoried but must be produced more-or-less simultaneously with its consumption.

Since the Postal Service has similar types of variation in the demand for its services, it is plausible that it too might find one or more of these differential pricing approaches beneficial. No study, however, has attempted to list the qualitative pros and cons, much less develop lists of "all operational benefits," or possible disadvantages. Presumably, each individual proposal would have costs and benefits that would be specific to that particular proposal.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

OCA/USPS-98 Please describe how the Postal Service monitors mail on hand in plants and delivery units. Please provide copies of all instructions or other documents that describe the reporting or monitoring of mail on hand. Please provide blank copies of all forms used for or generated from the reporting or monitoring of mail on hand.

Response:

The Postal Service uses electronic reporting systems to monitor mail on hand: the Mail Condition Reporting System (MCRS) for plants and the Customer Services Daily Reporting System (CSDRS) for delivery units. Manuals describing these systems and containing blank forms are provided in Microsoft Word format on a diskette as USPS-LR-J-153. The MCRS manual is also zipped.

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.

Michael Tidwell

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