

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-172-176)
November 2, 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-172. For FYs 1993 through 2002, please provide

- a. an inventory of mail processing equipment at each Processing and Distribution Center (P&DC), Processing and Distribution Facility (P&DF), and Bulk Mail Center (BMC); please include date of purchase, date of installation, and date of entry into full routine service;
- b. volumes by postal quarter (PQ) and accounting period (AP) by plant (*i.e.*, each individual P&DC, P&DF, and BMC) by mail processing cost pool; and
- c. workhours by PQ and AP by plant (*i.e.*, each individual P&DC, P&DF, and BMC) by mail processing cost pool.

OCA/USPS-173. Please refer to the response to interrogatory OCA/USPS-95.

Please provide a response that normalizes for

- a. PQ4 (*e.g.*, multiply by 0.75) to take account of the fact that PQ4 has 4 APs and the other PQs have 3 APs;
- b. Census 2000 mailings;
- c. Other adjustments performed by Postal Service cost, volume, and revenue witnesses, including data systems witnesses and forecasting witnesses, to account for nonrecurring events.

OCA/USPS-174. In the letter-shaped mailstream, is there a correlation between

- a. weight and thickness of mail pieces?
- b. thickness of mail pieces and the rate at which stackers fill?
- c. thickness of mail pieces and mail processing labor costs?

- d. other mail piece characteristics (not weight or thickness) and mail processing labor costs?
- e. Please provide copies of any documents that support the responses to Parts a. through d., above. If no documents are available, please provide an explanation of the responses.

OCA/USPS-175. Please refer to the response to interrogatory OCA/USPS-44 and to the attachment thereto.

- a. For each piece of equipment tested (*i.e.*, ECA optical character reader (OCR), Pitney Bowes OCR, Burroughs OCR, ECA bar code sorter (BCS), Bell & Howell BCS), please provide the number currently in normal service in mail processing facilities.
- b. Please confirm that mail piece characteristics other than weight (*i.e.*, thickness, length, height, and aspect ratio) were varied simultaneously with weight during data collection. If you do not confirm, please explain.
- c. Please provide copies of any documents relating to the correlation between letter-shaped mail piece weight and mail processing equipment performance.
- d. The following statement appears at page three of the Attachment (emphasis added):

Tests were conducted both with pure runs as well as intermixed with ***the existing mail base***, and the same conclusion was reached—throughput decreased as the heavier mail is fed.

Has this statement been corroborated since February 15, 1994? If so, please provide copies of any documents related to such corroboration.

- e. Please reconcile the statement quoted in Part d., above, with the response to Part b. of interrogatory OCA/USPS-44.
- f. Please provide copies of any Engineering Center documents dated after February 15, 1994, relating to the affect on mail processing equipment of mail piece characteristics.

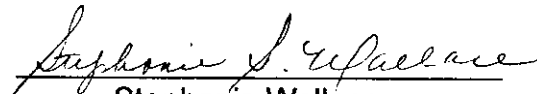
OCA-USPS-176. Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 letter-shaped pieces are identical in every respect but one. More specifically, each letter-shaped piece in each group is automation compatible, barcoded, and weighs one ounce. However, the pieces in one group are twice as thick as the pieces in the other group.

- 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 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. Please confirm that the thicker pieces would fill twice as many trays per hour.
- h. Please confirm that the responses to Parts a. through g. 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). 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 consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. 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.


Stephanie Wallace

Washington, D.C. 20268-0001
November 2, 2001