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

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–142-150, 153-154, 159)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS–142-150, 153-154, 159, filed on October 25, 2001. Objections to CA/USPS-151, 152, 155 were filed on November 6, 2001. Per the request of OCA Counsel, a partial response has been provided for OCA/USPS-154.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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OCA/USPS-142 Please refer to the response to OCA/USPS-42 and the table below.

LETTER-SHAPED PIECES				
Mail Processing				
Operation	Equipment	First-Class Single-Piece	First-Class Presort	Standard Mail Regular
[1]	[2]	[3]	[4]	[5]
Entry Activity				
Package Sorting	Piecarts			
Outgoing RBCS				
ISS/RCR	AFCS-ISS/RCR			
	MLOCR-ISS/RCR			
	DIOSS/RCR			
REC	VDT			
OSS	DBCS-OSS			
	DIOSS			
	MPBCS-OSS			
LMLM	LMLM			
Outgoing Primary				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
Outgoing Secondary				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
Incoming RBCS				
ISS/RCR	AFCS-ISS/RCR			
	MLOCR-ISS/RCR			
	DIOSS/RCR			
REC	VDT			
OSS	DBCS-OSS			
	DIOSS			
	MPBCS-OSS			
LMLM	LMLM			
Incoming MMP				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
Incoming SCF/Prim				
Automation	DBCS			
	MPBCS			
Manual	Letter Cases			
5-Digit Barcode Sort				
	DBCS			
	MPBCS			
Incoming Secondaries				
Auto Carrier Route	DBCS			
	MPBCS			
Auto 3-Pass DPS	CSBCS			
Auto 2-Pass DPS	DBCS			
	MPBCS			
Man Inc Secondary Final at Plant	Letter Cases			
Man Inc Secondary Final at DDU	Letter Cases			
Box Section Sort, DPS	-----			
Box Section Sort, Other	-----			

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Column [1]: Remote Bar Coding System (RBCS); Input Sub System/Remote Computer Reader (ISS/RCR); Output Sub System (OSS); Remote Encoding Center (REC); Letter Mail Labeling Machine (LMLM); Managed Mail Program (MMP); Sectional Center Facility (SCF); Delivery Point Sequence (DPS); and, Destination Delivery Unit (DDU).
Column [2]: Advanced Facer Canceler System-Input Sub System (AFCS-ISS); Multiline Optical Character Reader-Input Sub System (MLOCR-ISS); Remote Computer Reader (RCR); DBCS/OCR/ISS/OSS (DIOSS); Video Display Terminal (VDT); Letter Mail Labeling Machine (LMLM); Delivery Bar Code Sorter (DBCS); Mail Processing Bar Code Sorter (MPBCS); and, Carrier Sequencing Bar Code Sorter (CSBCS).

a. Please confirm that Column [1] identifies all the mail processing operations in the processing of letter-shaped mail. If you do not confirm, please explain and identify all the mail processing operations associated with the processing of letter shaped mail.

b. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail. If you do not confirm, please explain and identify all the mail processing equipment used in the processing of letter-shaped mail.

c. Please confirm that Column [2] identifies all the mail processing equipment used in the processing of letter-shaped mail that is associated with each mail processing operation in Column [1]. If you do not confirm, please explain and identify all the mail processing equipment in each mail processing operation associated with the processing of letter-shaped mail.

d. In Columns [3], [4], and [5], please identify the mail processing equipment used in the processing of letter-shaped First-Class Single-Piece, First-Class Presort, and Standard Mail Regular, respectively.

RESPONSE:

a. Not confirmed. The tasks in this table only represent the mail processing operations that were modeled in USPS LR-J-60. The costs represent those tasks mapped to the "worksharing related proportional" cost pools. The tasks mapped to the "worksharing related fixed" and "non-worksharing related fixed" cost pools (please see USPS LR-J-155, page I-11 to I-27) are also classified as mail processing tasks but are not listed in the table.

RESPONSE TO OCA/USPS-142 (CONTINUED)

b.c. Not confirmed. The MPBCS-OSS is still relied upon for both the outgoing and incoming operations. In addition, the box section sort refers to the clerks who case the mail directly into each box. Consequently, no letter cases are used. Finally, the RCR costs are imbedded in the piggyback factor that is used for the ISS. It should be noted that the AFCS-ISS tasks are not actually included in the models found in USPS LR-J-60. The table shown above has been updated accordingly.

d. The same processing equipment is used to process all letters and cards, regardless of class and/or presort level.

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OCA/USPS-143 Please refer to the response to OCA/USPS-42, the table in interrogatory OCA/USPS-142, and USPS-LR-J-60.

a. From USPS-LR-J-60 at page 46, please match the items in the "Description" column with Column [2], and the items in the "MODS [Management Operating Data System] Productivity" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.

b. From USPS-LR-J-60 at page 48, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.

c. From USPS-LR-J-60 at page 49, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column with Columns [3] and [4] in the table in interrogatory OCA/USPS-142, respectively.

d. From USPS-LR-J-60 at page 81, please match the items in the "Description" column with Column [2], and the items in the "MODS Productivity" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

e. From USPS-LR-J-60 at page 83, please match the items in the "Operation Description" column with Column [2], and the items in the "Value" column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

f. From USPS-LR-J-60 at page 84, please match the items in the "Description" column with Column [2], and the items in the "[MODS] Operation No." column with Column [5] in the table in interrogatory OCA/USPS-142, respectively.

RESPONSE:

a. d. The productivity data relied upon in USPS LR-J-60 on pages 46 and 81 represent aggregate values when more than one piece of equipment is used for a given operation. For example, the MPBCS (MODS No. 871) and DBCS (MODS No. 891) are both used to process letters and cards in an outgoing primary operation. Consequently, the productivity value used for the automation outgoing primary operation in USPS LR-J-60 is an aggregate of MODS operation numbers 871 and 891. In addition, the productivity data represent aggregate values for all letters and cards, regardless of class and/or presort level. The actual productivity values by operation can be found on the individual "COSTS" spreadsheets in USPS LR-J-60.

RESPONSE OF OCA/USPS-143 (CONTINUED)

b. e. The piggyback factors relied upon in USPS LR-J-60 on pages 48 and 83 represent aggregate values when more than one piece of equipment is used for a given operation, with one exception. The MLOCR-ISS is still the predominant ISS system for presort letters. Consequently, the MLOCR piggyback factor is used for ISS processing. The BCS automation piggyback factors use the FY 2000 MODS volumes to calculate weighted productivities based on the percentage of the mail that is processed on a DBCS versus a MPBCS. The piggyback factors represent aggregate values for all letters and cards, regardless of class and/or presort level. The actual productivity values by operation can be found on the individual "COSTS" spreadsheets in USPS LR-J-60.

c. f. The answers to these questions are self evident given that the MODS data found in USPS LR-J-60 pages 49 and 84 list both the operation and the equipment under the "Description" heading.

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OCA/USPS-144

Please refer to the response to OCA/USPS-44(b).

a. Please confirm that in order to process automation compatible barcoded First-Class and Standard Regular letter-shaped pieces into Delivery Point Sequence (DPS), the Postal Service would use one of the following pieces of equipment: Delivery Barcode Sorter (DBCS), Mail Processing Barcode Sorter (MPBCS) or Carrier Sequence Barcode Sorter (CSBCS). If you do not confirm, please explain and identify all pieces of equipment used to process such letter-shaped pieces into DPS.

b. Please confirm that only barcoded First-Class and Standard Regular letter-shaped pieces sorted to 5-digit are presented to DBCS, MPBCS and CSBCS for processing into DPS. If you do not confirm, please explain.

Response:

(a) Confirmed.

(b) Not confirmed. Barcoded carrier-route presorted letters are presented to the CSBCS. Also, if a barcode clear zone does not exist or the barcode is not readable, letters can be sorted to DPS using ID Code Sortation (ICS). See page 7 of my testimony for more information.

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OCA/USPS-145

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 rate and the other 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 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., 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 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.

Response:

(a) Not confirmed. First-Class Mail and Standard Mail are sometimes processed on different sort plans. See response to OCA/USPS-42b. The First-Class sort plans likely involve the use of more stackers in order to hold out more zones and firms for service reasons. I am unaware of any testing conducted to quantify the impacts of these differences on equipment throughput. However, even though the pieces are identical in this example, there are inherent differences in piece characteristics between First-Class Mail and Standard Mail that affect throughput. It is my understanding that the transport velocities remain constant on all letter and flat automation equipment.

(b) Based on the differences spelled out in part (a) and absent testing, this cannot be confirmed. These differences would likely impact productivity.

(c) Not confirmed. The wage rates would not be exactly the same due to the time of day that each class of mail is processed. First-Class Mail tends to be processed during Tours I and III when employees earn "premium pay." Standard Mail is more likely to be processed during Tour II. Premium pay adjustment factors are found in USPS LR-J-60.

(d) Based on the responses to parts (a - c) above, not confirmed.

(e – g) The responses for parts (a – d) would be the same as above when the additional criteria spelled out in parts (e – g) are individually factored in.

(h) Not confirmed. Due to mail pieces that are rejected on the first pass and generally a different number of stackers are used in each of the passes.

(i) Not confirmed. Processing very large quantities of First-Class mail may require different operational procedures than will be required to process the same volume of Standard Mail. This will, in turn, affect the ratio between the Standard Mail

productivity (cost) and First-Class productivity (cost). For example, a very large First-Class mailing would have to be run on several parallel machines to clear within the First-Class processing window required to meet service standards. The Standard mailing of the same size might be run on a single machine, or at least a smaller number of parallel machines. Fewer machine set-ups and take-downs for the Standard Mail could increase productivity and reduce cost.

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OCA/USPS-146

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 rate and the other 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 MPBCS. 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 MPBCS 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., except that each group of letter-shaped pieces is processed in two passes on the same MPBCS. 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 MPBCS.
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 MPBCS. 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 MPBCS. 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 consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

Response:

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(a – i) The responses to OCA/USPS-145, parts (a – i) respectively, would be the same when considering the MPBCS.

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OCA/USPS-147

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 rate and the other 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 CSBCS. 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 CSBCS 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., except that each group of letter-shaped pieces is processed in two passes on the same CSBCS. 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 CSBCS.
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 CSBCS. 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 CSBCS. 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 consisted of 100,000, 1 million, and 10 million letter-shaped pieces, respectively. If you do not confirm, please explain.

Response:

(a) See OCA/USPS-145(a).

(b) See OCA/USPS-145(b).

(c) Assuming the factors in the response to OCA/USPS-145, part (c) are not factors on the CSBCS, since processing typically occurs only on Tour II; this can be confirmed. First-Class Mail and Standard Mail are not processed separately on the CSBCS for DPS processing.

(d) See OCA/USPS-145(d).

(e – g) The responses for parts (a – d) would be the same as above when the additional criteria spelled out in parts (e – g) are individually factored in.

(h) See response to OCA/USPS-145(h).

(i) See response to OCA/USPS-145(i).

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OCA/USPS-148 Please refer to the response to POSTCOM/USPS-T39-8(a).

a. For the DBCS and MPBCS, please describe the algorithm on the first pass and the second pass that permits the processing of letter-shaped pieces into DPS.

b. For the CSBCS, please describe the algorithm on the first pass, the second pass and the third pass that permits the processing of letter-shaped pieces into DPS.

Response:

(a) On the first pass, the letters are sorted to stackers based on delivery points. For example, the first stacker will contain each carrier's first delivery point; the second stacker will contain each carrier's second delivery point, etc. If there are more delivery points than stackers on the machine, the delivery points will "wrap". For example, the first stacker on the first pass will contain each carrier's first delivery point and some carrier's two-hundred and first point. The number of times the delivery points "wrap" for a specific carrier will determine the exact number of stackers needed for that carrier on the second pass. On the second pass, the order of the trays is maintained from the first pass and the tray containing the first, two-hundred and first, and four-hundred and first, etc. delivery points is feed through first and the letters are sorted to each carrier, with the first, two-hundred and first, and four-hundred and first, etc. delivery points sorted to separate stackers for each carrier, as necessary. See attachment for a diagram.

(b) Every stop on a delivery route represents a number in the sequence of all of the points on the route in the order that the route is delivered. For example, each stop on a route with 327 delivery points can be assigned a delivery sequence number, one through 327. On the first pass of a CSBCS, the points are sorted off of the units place of the delivery sequence number. For example, the 1st, 11th,

21st, through 321st delivery points are sorted to the first stacker; and the second stacker will contain all delivery points with a two in the units place. On the second pass, the trays are feed back in order and are sorted off of the tens place in the delivery sequence number. For example, the first stacker would contain the 10th through 19th, 110th through 119th, etc. delivery points. Finally, the third pass will sort the delivery points of the hundreds place, resulting in a DPS. There are slight variations to this process in order to maximize bin usage and minimize sweep time; however, this represents the basic algorithm. See the attachment.

Attachment to OCA/USPS-148

DBCS Delivery Point Sequencing Sample Diagram

Using a DBCS with 100 bins available for DPS, 2 passes are required for a sample zone of 14 carrier routes with 620 to 700 possible deliveries each. The following shows how the sort programs assigns the delivery sequence numbers.

FIRST PASS:

Bin #1	2	3	4	5	.	.	.	98	99	100
1	2	3	4	5	.	.	.	98	99	100
101	102	103	104	105				198	199	200
201	202	203	204	205				298	299	300
.	.	.	.	.	.	.	.	.	.	.
.	.	.	.	.	.	.	.	.	.	.
601	602	603	604	605				698	699	700

Letters are actually in random order within each bin.

Bin 1 includes delivery points 1, 101, 201, etc. for ALL carrier routes in the zone.

Since there is a maximum of 700 possible deliveries per route and only 100 available bins, there are 7 "wraps" around the DBCS in this example.

SECOND PASS:

Bin #1	2	3	4	5	6	7	...	96	97	98
1	101	201	301	401	501	601	...	401	501	601
2	102	202	302	402	502	602	...	402	502	602
3	103	203	303	403	503	603	...	403	503	603
.	.	.	.	.	.	.	...	.	.	.
.	.	.	.	.	.	.	...	.	.	620
100	200	300	400	500	600	700		500	600	

[_____ Carrier Route #1 _____] [___Carrier Route #14 __]

Mail from Bin 1 First Pass is fed first on the second pass, then Bin 2, etc. The feed sequence of trays MUST be maintained to get delivery point sequence.

Letters are in carrier walk sequence order within each bin.

Bin 1 includes delivery sequences 1 through 100 for carrier route #1 ONLY. Bins 1 through 7 may have to be consolidated into two or three trays.

Bin 98 includes delivery sequences 601 through 620 for carrier route #14 ONLY.

Attachment to OCA/USPS-148

On a CSBCS

1st pass Sort On Unit #

1	2	3	4	5	6	7	8	9	10
010	001	002	003	024	005	056	087	108	009
200	011	132	013	214	055	086	017	068	079
	021	022	223	034	135	046	257		099
	101	102	123	124	125		237		
	201								
	111								
	211								

2nd pass Sort On Tenth #

1	2	3	4	5	6	7	8	9	10
200	010	021	132	046	055	068	079	086	099
001	011	022	034		056			087	
101	111	223	135		257				
201	211	123	237						
002	013	024							
102	214	124							
003	017	125							
005									
108									
009									

3rd pass Sort On Hundredth #

1	2	3	4	5	6	7	8	9	10
001	101	200							
002	102	201							
003	108	211							
005	111	214							
009	123	223							
010	124	237							
011	125	257							
013	132								
017	135								
021									
022									
024									
034									
046									
055									
056									

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OCA/USPS-149 Please refer to USPS-LR-J-60.

a. At page 52, please confirm that the presort letters mail flow densities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.

b. At page 89, please confirm that the presort letters mail flow densities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.

c. Please confirm that the mail flow densities on pages 52 and 89 are the same. If you do not confirm, please explain.

d. Please confirm that the identical mail flow densities for First-Class and Standard Regular letter-shaped pieces implies the same sort schemes and the same mail processing operations for First-Class and Standard Regular letter-shaped pieces. If you do not confirm, please explain.

e. At page 46, please confirm that the marginal volume variable productivities are those used for First-Class letter-shaped pieces. If you do not confirm, please explain.

f. At page 81, please confirm that the marginal volume variable productivities are those used for Standard Regular letter-shaped pieces. If you do not confirm, please explain.

g. Please confirm that the marginal volume variable productivities on pages 46 and 81 are the same. If you do not confirm, please explain.

h. Please confirm that the identical marginal volume variable productivities for First-Class and Standard Regular letter-shaped pieces implies the same costs for First-Class and Standard Regular letter-shaped pieces undergoing the same mail processing operations. If you do not confirm, please explain.

RESPONSE:

a. Confirmed.

b. Confirmed.

c. Confirmed.

d. Not confirmed. The use of average data reflect the fact that it is difficult to obtain disaggregated data by class of mail, given that the MODS operation numbers

RESPONSE TO OCA/USPS-149 (CONTINUED)

used for First-Class Mail letters and cards and Standard Mail letters operations are identical. In addition, the application of CRA proportional adjustment factors should "smooth" out any class-specific differences.

e. Confirmed.

f. Confirmed.

g. Confirmed.

h. Not confirmed. Please see the response to OCA/USPS-149(d).

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OCA/USPS-150. Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Bozzo since June 1996.

RESPONSE:

The following responsive documents are already on file with the Commission:

Management Operating Data System, Handbook M-32 (See USPS-LR-H-147 in Docket No. R97-1 and USPS-LR-J-165 in this docket).

In-Office Cost System, Handbook F-45 (See USPS-LR-I-14 in Docket No. R2000-1).

Summary Description of USPS Development of Costs by Segments and Components (See USPS-LR-1 in each of the recent rate case dockets).

The following responsive documents may be inspected at Postal Headquarters by making arrangements with counsel for witness Bozzo (Frank Heselton at 202/268-4823 or Eric Koetting at 202/268-2992):

Management Operating Data System, Participant's Guide (Rev. 4/2000)

Managing Images & Mailflows with the Remote Barcode System (Western Area In-Plant Support, July 1996)

The following document was only made available to Dr. Bozzo by Lockheed Martin under a non-disclosure agreement, and is therefore unavailable:

Remote Computer Reader, Parameter Analysis Training (March 1997, Lockheed Martin Federal Systems)

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-153. Please provide copies of every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Van-Ty-Smith since June 1996.

Response to OCA/USPS-153

- The IOCS F-45 handbook filed in USPS-LR-I-14/R2000-1 and the supplemental instructions to the F-45 filed in USPS-LR-J-34/R2001-1.
- Summary Description of USPS Development of Costs by Segments and Components for various years (see USPS-LR-1 in each recent rate case).
- MODS handbook M-32 (USPS-LR-H-147 and J-165)

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-154. Please provide a list of every document relating to mail processing operations, peak-load costs, or production under uncertainty that was relied on by witnesses Bozzo, Kingsley, or Van-Ty-Smith in the preparation of their testimonies in this docket.

PARTIAL RESPONSE (A more complete response will be filed subsequently):

Docket No. R97-1, USPS-T-4 (Moden)

Docket No. R97-1, USPS-RT-8 (Steele)

Docket No. R2000-1, USPS-T-10 (Kingsley)

Docket No. R2000-1, USPS-T-15 (Bozzo)

Docket No. R2000-1, USPS-T-16 and USPS-RT-5 (Degen)

Docket No. R2001-1, USPS-T-14 (Bozzo)

Docket No. R2001-1, USPS-T-39 (Kingsley)

Lists of MODS operations in use, FY 1993-FY 2000

Economic and econometric sources cited by Dr. Bozzo in USPS-T-14 (R2001-1) and USPS-T-15 (R2000-1)

The IOCS F-45 handbook filed in USPS-LR-I-14/R2000-1 and the supplemental instructions to the F-45 filed in USPS-LR-J-34/R2001-1.

The IOCS file layout in Appendix A filed in USPS-LR-J-10.

Summary Description of USPS Development of Costs by Segments and Components, FY 2000, filed in USPS-LR-J-1.

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

OCA/USPS-159

Please refer to the response to Interrogatory OCA/USPS-21(f).

a. Please explain why no data are available.

b. Are there LDC or MODS codes for "handwriting recognition" equipment? If so, what are those codes?

c. Please provide any available data on volumes processed through "handwriting recognition" equipment for FYs 2000 and 2001. To the extent possible, please provide breakdowns by FY by PQ by AP by shape by subclass.

Response:

a. The Remote Computer Read (RCR) system (which includes "handwriting recognition" equipment), like virtually all MODS operations, does not differentiate/track volumes or workhours by class.

b. There is no direct labor associated with the RCR, or handwriting recognition. It is equipment *between* the ISS and the keyers at a REC that handle images not resolved by RCR, *not* pieces of mail. Therefore, there are no LDCs or MODs codes other than the ones for feeding pieces on ISSs and OSSs regardless of where the result comes from.

c. The Remote Computer Read (RCR) system finalizes images for both handwritten and machine printed letters and cards (no other shapes at this time). There is no way to distinguish from the available data whether a letter is handwritten or machine printed, or to identify by class or sub-class.

RCR Finalized the following number of images in FY 2001: 976,675,160 in AP13; 4,139,673,042 in Qtr 4; and 15,318,443,638 for the entire FY.

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.

Joseph K Moore

Joseph K. Moore

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November 8, 2001