

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

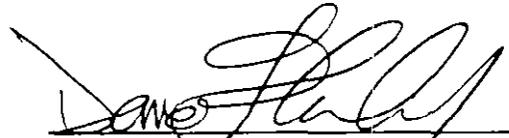
POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
TO USPS WITNESS BRADLEY**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness Bradley: DMA/USPS-T13, Nos. 1-13. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.



Dana T. Ackerly II

Dated: July 29, 1997

WITNESS BRADLEY (USPS-T-13)

DMA/USPS-T13-1. Please describe the flexibility that a manager at a mail processing facility has in adjusting his labor force to the amount of mail which must be processed.

- a. If during a shift it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- b. If, over the course of an Accounting Period (AP), it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- c. If, over the course of a year, it is clear that there is extra labor, are there limits to the manager's ability to size the work force to the amount of work?
- d. To the extent that there is extra labor during a shift, how does a manager decide which operation to assign the labor to?

DMA/USPS-T13-2. Please refer to page 13, lines 12-16 of your testimony. Please explain why current staffing in an operation may depend on the volume in the previous period.

DMA/USPS-T13-3. Please refer to pages 16 and 17 of your testimony where you describe the "manual ratio," and page 9 where you list the elasticities you calculated for 25 mail processing operations.

- a. In estimating each of these elasticities, did you use a manual ratio?
- b. If the answer to (a) above is no, for which activities did you not use a manual ratio?
- c. Pages 16 and 17 describe the manual ratio for flats and letters? If you used a manual ratio for activities that are not flat or letter based, please describe the manual ratio.

DMA/USPS-T13-3. Please refer to footnote 8 on pages 18-19 of your testimony which mentions a preliminary study underway to collect data on direct cost drivers for platform activities.

- a. Who is performing the study?
- b. When is it scheduled to be completed?
- c. Are there plans to perform comparable studies for other allied activities?

DMA/USPS-T13-4. Please refer to pages 18 and 19 of your testimony. For allied activities, does the current staffing in an AP depend on the volume in the previous period?

DMA/USPS-T13-5. Please refer to page 18 of your testimony where you state that the BMCs report to the PIRS system. Please provide any Handbooks or other documentation which describes the PIRS system.

DMA/USPS-T13-6. On page 21 of your testimony, you state that you use Total Equivalent Pieces (TEP) as the measure of workload at BMCs. Please describe the derivation of TEP.

- a. For which operations does TEP use actual counts and on which operations are counts derived from conversion factors?
- b. If any TEP are derived by conversion factors, please provide them.
- c. If any TEP are derived by conversion factors, when were the conversion factors developed?

DMA/USPS-T13-7. Do you use a lag in estimating the elasticity for the remote encoding activity?

DMA/USPS-T13-8. Do you use a lag for estimating the elasticity of the registry activity?

DMA/USPS-T13-9. On page 31 you state that if a site has more than one set of continuous data, you use the most recent set in estimating elasticities. Why did you not use all continuous sets? In how many instances is there more than one set of continuous data?

DMA/USPS-T13-10. Please refer to your discussion of backstop activities on page 58. If service standards were less stringent, would backstop activities be staffed at a lower level?

DMA/USPS-T13-11. Please refer to your discussion of gateway activities on page 57 and 58. If service standards were less stringent, would gateway activities be staffed at a lower level?

DMA/USPS-T13-12. Please refer to Page H148-5 of Library Reference H148.

- a. Please confirm that the ratio of TMANF to HMANF from data set VVDA1.DATA for the facility with the IDNUM of 19 for FYAP 9308 is .8553. Please confirm that this refers to a productivity of 855.3 handlings per hour.
- b. Please confirm that TMANF ("Manual Flat TPH") is in thousands of TPH and that HMANF ("Manual Flat Workhours") is in hours.

- c. Please confirm that, for all fields in VVDA1.DATA, workhours are in hours and TPH are in thousands.
- d. Please confirm that, for all data described in Library Reference H-148, workhours are in hours and TPH are in thousands.

DMA/USPS\T13-13. Please refer to Page H148-10 and H148-11 of Library Reference H148. Please confirm that the TOCB field refers to total piece handlings on OCRs and the HOCB field refers to total workhours on OCRs.