

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

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POSTAL RATE AND FEE CHANGES, 1997

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DEGEN TO INTERROGATORIES OF
TIME WARNER, INC.
(TW/USPS-T12-1-8)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of Time Warner, Inc.: TW/USPS-T12-1-8, filed on July 22, 1997.


Each interrogatory is stated verbatim and is followed by the response. Mr. Degen's declaration will be filed shortly.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 5, 1997

Response of United States Postal Service Witness Degen
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TW/USPS-T12-1.

- a. Was the LIOCATT program used to distribute clerk and mailhandler costs in this docket? If yes, please provide the output of the LIOCATT program.
- b. Please provide the LIOCATT output, as provided in previous rate cases, for the mail processing cost distribution used in the FY96 CRA report.

TW/USPS-T12-1. Response:

- a. The LIOCATT program was used to distribute clerk and mailhandler costs for FY96. The distribution of FY96 clerk and mailhandler costs to subclass does not use LIOCATT. Please consult LR-H-146 for full details.
- b. I am informed that the LIOCATT output relating to the FY96 CRA report was provided by the Postal Service on July 9, 1997, pursuant to the Commission's periodic reporting rules, and is thus presumably on file with the Commission's docket section.

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TW/USPS-T12-2.

- a. Approximately when did the Postal Service decide to move to MODS based attribution of clerk and mailhandler wage costs?
- b. Prior to the new method described in your testimony, was any use made of the MODS numbers recorded by IOCS clerks? If yes, please describe how this information was used.
- c. How does an IOCS clerk know which MODS number to enter for a sampled clerk or mailhandler? Please provide a copy of the instructions given to IOCS clerks for the purpose of recording the correct MODS number.
- d. During FY96, were IOCS clerks aware that the MODS numbers they recorded would be put to a much more important use than in any previous year?
- e. During FY96, were IOCS clerks aware that their detailed observations of the activity performed by sampled employees would be superseded by MODS numbers?
- f. Since when have MODS numbers been recorded by IOCS clerks?
- g. When a sampled employee is on a break, and after the break will start an assignment different from the one he had before the break, which MODS number is the IOCS clerk supposed to record?
- h. What proportion of IOCS tallies taken in MODS facilities had a valid MODS number in FY96?
- i. What procedures were applied to assure that the MODS numbers recorded by IOCS clerks were not only valid numbers but correctly described the observed employee's activity?
- j. What proportion of the IOCS tallies, taken in MODS facilities but without valid MODS numbers, could not be assigned to any cost pool? If there were such tallies, please explain how they were used.

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TW/USPS-T12-2 Response.

- a. It is my understanding that, in light of the controversies over mail processing cost distribution that arose over the last several general rate cases, the Postal Service began to consider a number of potential improvements to the mail processing cost distribution process. One type of potential improvement that was under consideration over the last several years was the methodology presented in this case in my testimony and that of Dr. Bradley. It was recognized, however, that consideration of such a comprehensive change would require a great deal of data assessment and database development, feasibility research, coordination with operational personnel, and other similar types of preparation activities. It would be quite difficult for me or anyone else to identify any particular point in time during this process that the Postal Service "decided to move" to the new approach. Refinements in the methodology, including the incorporation of more recent data, continued virtually up to the point of filing of this case.

- b. To the best of my knowledge the MODS number recorded by IOCS clerks has not been used in the LIOCATT cost distribution system prior to now, however, it is my understanding that the MODS operation number has been used for various other analyses over the years. I am not familiar

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with the details of these other analyses.

- c. The data collector can ask the employee or ask the employee's supervisor. Note that for the purposes of the costing method described in my testimony, the correct MODS number is the MODS operation the employee is actually clocked into, which is not necessarily the operation in which he/she is working. While the MODS number and the observed activity are consistent in most cases, when the two are inconsistent, the tally should be associated with the MODS clock number rather than the observed activity. This is because the variabilities are estimated using MODS data which include whatever clocking errors have occurred. The cost pools are consistent with the variabilities that are applied to them. The tallies are only used to form the distribution keys. The tallies must, likewise, be consistent with the cost pools and underlying variabilities. Hence, we rely on IOCS to report the operation into which an employee is clocked. The IOCS Field Operating Instructions (Handbook F-45) alert data collectors that the MODS work center number may not match the observed employee activity. Data collectors are instructed to "enter... [the] work center that the employee is clocked into at the time of the reading. The MODS work center number may not necessarily match the employee's activity at the time of the reading." Please see Handbook F-

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45, January 1995, p. 35. Similar wording may be found in the September 1990 and September 1991 releases of Handbook F-45. Handbook F-45 was filed in Docket No. MC96-3 as LR-SSR-12.

- d. My understanding is that no directives were issued to data collectors regarding this matter.
- e. It is not true that the MODS number supersedes the detailed observation of the employee's activity. Under the old methodology, CAG and Basic Function determined the cost pools for the LIOCATT cost distribution process. These did not rely on questions 18 and 19 that report the detailed activities of the employee being sampled. Under the new methodology, the MODS number is used to develop the distribution key. The distribution key must use the MODS number into which the employee is clocked so it is consistent with the cost pool. The observed activity questions are only used to predict the MODS number when the tally contains a missing or invalid MODS number. IOCS data collectors were not given any instructions regarding diminished importance of questions 18 and 19.

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- f. The recording of MODS numbers pre-dates the introduction of CODES IOCS. I researched past revisions of the IOCS Field Operating Instructions (Handbook F-45), and determined that data collectors were instructed to record the MODS number as early as FY84, and possibly before.
- g. The correct MODS number is the operation into which the employee is clocked. Please see LR-H-147, at section 312.124. Note that the assignment of IOCS tallies, including break/personal needs tallies, to cost pools does not affect the cost pool dollar amounts. Further, break and personal needs tallies are not used in the distribution key.
- h. There are 246 clerk and mailhandler tallies with "invalid" MODS numbers, and 2,297 tallies with blank or zero MODS numbers. These 2,543 tallies are approximately 1.32% of the 193,138 clerk and mailhandler tallies taken at MODS 1&2 offices.
- i. Please see the answer to part c, above. For purposes of the new costing methodology we need IOCS data collectors to report the operation into which sampled employees are clocked. This is how data collectors are instructed, and we believe this is what data collectors are doing with

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only a small number of exceptions. In the larger sense, we would also like the MODS data to be reasonably accurate with respect to the activity being performed, so that our estimation of variabilities is accurate. We believe the MODS data to be reasonably accurate, especially at the level of aggregation used in the cost model. A small number of erroneously clocked hours will not have a substantial impact on the variability estimates. Further, the variability estimates are done using an aggregation of MODS numbers. Any errors in clocking that occur among the operations within a cost pool have no effect on the cost pool formations, variability estimates, and the distribution keys.

- j. All tallies are assigned to cost pools. If the Question 18/19-based mapping cannot be carried out, the tally is assigned to either the "1MISC" or "LD43" cost pool. "LD43" is used as a residual cost pool because LDC 43 includes allied labor-type work at stations and branches. Please note, however, that the assignment of tallies to cost pools has no impact on the dollar value of the cost pool. For MODS offices, cost pools are formed by applying the proportions of MOD System hours to Pay Data System costs. The assignment of tallies only impacts the distribution key for each cost pool.

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TW/USPS-T12-3. Please refer to Tables 2 and 6 in your testimony.

- a. Does the line for "mixed mail" in Table 6 refer to costs associated with mail processing tallies showing IOCS activity codes 5300-5750? If no, please specify the types of tallies and the IOCS activity codes that this line represents.
- b. Does the line for "other" in Table 6 refer to costs associated with mail processing tallies showing IOCS activity codes 6521-6521? If no, please specify the types of tallies and the range of IOCS activity codes that this line represents.
- c. Please specify the IOCS activity codes that correspond to the costs shown for mail subclasses and service categories in Table 6.
- d. Do the various costs in Tables 2 and 6 represent identical sets of IOCS activity codes, distributed with the old and new methodologies respectively? If they do not represent the same set of IOCS codes, please clarify.
- e. Please provide a breakdown of the estimated costs show in Table 6 by MODS, BMC and non-MODS cost pools. In the case of "mixed mail" and "other" costs, please provide the breakdown both by cost pool and by IOCS activity codes.
- f. Please provide the information requested in Part E above, as well as the information contained in Tables 4 and 5 of your testimony, in the form of an Excel, Quattro or Lotus spreadsheet.

TW/USPS-T12-3. Response:

- a. Yes. Please note that I employed this definition of mixed-mail in Table 6 so that mixed-mail is defined consistently with Table 2. In the cost distribution methodology described in my testimony, IOCS Question 21 information is used to identify mixed-mail tallies. As a result, some tallies with mixed-mail activity codes are treated as not-handling-mail in

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the new methodology, and IOCS costs associated with some mail-related activities such as moving empty equipment are distributed as mixed-mail.

- b. The line for "other" in Table 6 includes all activity codes assigned to tallies in the mail processing cost pools except mail and special services codes (0010-4950) and mixed mail codes (5300-5750). Please consult the first attachment to the response to TW/USPS-T12-3 for a list of the activity codes. Descriptions of the activity codes may be found in LR-H-1.
1. The bulk of the tallies and tally dollars are in activity codes 6521-6523, and other activities traditionally associated with mail processing. Please see USPS-T-12, at 6-7, for a brief discussion of the "migration" of tallies between components.
- c. Please consult the second attachment to the response to TW/USPS-T12-3. This is derived from the source code to program MOD4DIST, lines 245-370, in LR-H-146.
- d. The "other" category is defined as a residual category in both cases. Since the "old" and "new" methodologies define mail processing differently, the activity codes included in "other" in Table 2 of my testimony are not the same as in Table A. Neither table incorporates a

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redistribution of mixed-mail or "other" costs to the subclasses of mail and special services.

- e. Please consult the third attachment to the response to TW/USPS-T12-3.

- f. The Microsoft Excel spreadsheet tw-3e.xls contains the response to part e in electronic form. The Excel spreadsheet table1-6.xls contains the information from Tables 1-6 in my testimony, USPS-T-12, in electronic form. These are filed in LR-H-219.

First attachment, Response to TW/USPS-T12-3

"Not-handling-mail" activity codes, definition from MOD1DIR, lines 12-32

Activity code is based on F262 field

<u>Activity Code</u>	<u>Comments</u>
10	Included with special services in Table 6
50	Included with special services in Table 6
90	Included with special services in Table 6
5020	
5040	
5050	
5060	
5070	
5080	
5090	
5110	
5120	
5130	
5170	
5180	
5610	Included with mixed-mail in Table 6
5620	Included with mixed-mail in Table 6
5700	Included with mixed-mail in Table 6
5750	Included with mixed-mail in Table 6
6000	
6010	
6020	
6030	
6040	
6045	
6050	
6070	
6073	
6080	
6110	
6120	
6130	
6140	
6170	
6180	
6200	
6210	
6220	
6230	
6231	
6240	
6270	
6320	
6330	
6420	

First attachment, Response to TW/USPS-T12-3

"Not-handling-mail" activity codes, definition from MOD1DIR, lines 12-32
Activity code is based on F262 field

<u>Activity Code</u>	<u>Comments</u>
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6430	
6460	
6480	
6495	
6500	
6511	
6512	
6514	
6516	
6519	
6521	
6522	
6523	
6570	
6580	
6610	
6620	
6630	
6640	
6650	
6660	

Second attachment, response to TW/USPS-T12-3

Assignment of IOCS activity codes to mail subclasses and special services

Subclass or Special Service	Activity Codes
First-Class	
Letters and Parcels	X060, X061, X092
Presort Letters and Parcels	X080, X081, X085, X086, X091, X093
Postal Cards	1000
Private Mailing Cards	1020, 1021, 1052
Presort Cards	1022, 1035, 1040, 1045, 1051, 1056
Priority Mail	X160, X165, X170, 5302
Express Mail	X110, X111, 5303
Mailgrams	1100
Second Class	
Within County	X211
Outside County – Regular	X212
Outside County – Non Profit	X213
Outside County – Classroom	X214
Third Class	
Single Piece Rate	X360
Bulk – Regular Carrier Route	X310, X315
Bulk – Regular Other	X340, 1345, 2345
Bulk – Non Profit Carrier Route	X330, X335
Bulk – Non Profit Other	X350
Fourth Class	
Parcels – Zone Rate	4400, 4405, 4410, 4491, 4492
Bound Printed Matter	4460, 4465, 4470, 4480, 4490, 4495, 4496
Special Rate	X420, X425, X430, X435
Library Rate	X440
USPS	X510, 5346
Free for Blind/Handicapped	X910, X915, X950, 5347
International	X7XX, X8XX, 5460, 5461
Registry	0060
Certified	0050
Insurance	0070, 0080
COD	0030
Special Delivery	0010
Special Handling	0020
Other Special Services	0090, 0190, 0210, 0300

Note: Class-specific mixed mail codes (53XX-54XX) are included as "Mixed Mail" in USPS-T-12, Table 2 and Table 6.

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	manl	manf	manp	mecparc	spbs Oth	spbs Prio	lsm/	fsm/
1st L&P	409,628	102,638	1,735	581	7,792	3,475	345,019	219,938
PvtCds	22,037	40	0	55	32	4	18,087	172
PostalCds	376	0	0	0	0	0	379	0
PreL	77,050	7,674	153	0	373	361	48,873	10,787
PreCds	5,726	212	0	0	61	0	2,599	0
Priority	2,159	5,716	2,787	1,031	2,509	10,271	62	4,792
Express	709	439	84	0	0	0	61	58
2nd IC	429	1,809	0	0	34	0	72	218
2nd NP	1,338	6,250	92	53	474	53	200	4,761
2nd CL	0	237	0	0	58	0	0	435
2nd Reg	6,390	41,546	402	99	2,070	453	564	24,110
3rd SP	4,006	2,537	130	0	466	77	1,579	2,597
BRCRT	6,304	3,992	227	101	2,818	317	2,103	5,617
BRO	95,992	62,922	980	149	11,371	509	20,654	102,018
NPCRT	1,033	355	0	45	177	0	479	416
NPO	39,838	12,887	72	146	2,106	0	9,613	16,396
4th ZPP	409	418	1,427	637	274	285	53	563
BPM	251	1,585	242	162	351	58	0	843
SPC	197	485	427	53	141	111	73	728
LIB	50	419	111	103	58	0	0	212
Mailgrams	49	0	0	0	0	0	0	0
Free	264	341	0	0	203	237	0	0
Intl	8,777	3,066	159	0	64	376	7,455	3,396
USPS	3,283	1,008	223	44	261	218	1,438	2,330
Registry	461	59	49	0	32	61	23	69
Certified	0	0	0	0	0	0	0	0
Insurance	0	0	0	0	0	0	0	0
COD	0	0	0	0	0	0	0	0
Sp Delvry	0	0	0	0	0	0	0	0
Oth SSv	4,304	877	0	143	30	0	1,583	1,500
Total Direct Mail	691,059	257,511	9,302	3,401	31,753	16,867	460,968	401,956
Mixed Mail								
5301	0	71	0	0	0	0	0	64
5302	0	0	26	0	28	188	0	0
5303	0	0	0	0	0	0	0	0
5331	0	0	0	0	42	0	0	0
5340	182	2,177	0	0	185	0	73	1,281
5341	0	37	0	0	73	0	0	0
5345	0	0	0	0	0	0	0	0
5460	85	57	6	0	0	69	76	69
5461	0	0	0	0	0	0	0	0
5610	103,303	3,977	233	41	188	263	65,382	4,777
5620	4,328	55,263	152	0	154	262	732	87,732
5700	589	204	2,523	1,325	1,938	1,632	275	402
5750	14,479	5,131	2,983	955	18,849	10,669	2,600	6,153
Total Mixed Mail	122,965	66,916	5,922	2,321	21,456	13,083	69,137	100,478
Other								
5020	114	71	0	0	0	0	0	0
5040	256	165	22	35	0	0	59	614
5050	0	0	0	0	0	0	0	0
5060	0	0	0	0	0	0	0	0
5070	0	0	0	0	0	0	0	0
5080	0	0	0	0	0	0	0	149
5090	0	0	0	0	0	0	0	0
5110	0	0	0	0	0	0	0	0
5120	0	0	0	0	0	0	0	0
5130	0	0	0	0	0	0	0	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	manl	manf	manp	mecparc	spbs Oth	spbs Prio	ism/	fsm/
5170	89	0	0	0	0	0	0	203
5180	0	0	0	0	0	0	0	0
6000	203	0	0	0	0	0	0	51
6010	626	0	0	0	0	0	0	212
6020	727	119	0	0	0	0	0	0
6030	290	166	0	0	0	0	0	84
6040	0	0	0	0	0	0	0	0
6045	0	0	0	0	0	0	0	0
6050	0	54	0	0	0	0	0	0
6070	0	0	0	0	0	0	0	0
6073	0	0	0	0	0	0	0	0
6080	0	0	0	0	0	0	0	0
6110	0	0	0	0	0	0	0	0
6120	0	0	0	0	0	0	0	0
6130	0	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0	0
6170	533	153	0	60	0	0	191	190
6180	0	0	0	0	0	0	62	0
6200	0	54	0	0	0	0	0	50
6210	440	392	139	36	54	0	94	283
6220	79	0	0	0	0	0	0	0
6230	511	156	24	0	0	0	350	73
6231	638	220	49	0	0	0	119	60
6240	3,711	522	24	0	52	0	66	137
6270	0	0	0	0	0	0	0	0
6320	51	0	42	0	0	0	0	106
6330	305	48	0	0	0	0	0	140
6420	213	103	24	0	88	3	224	0
6430	1,411	371	65	0	265	144	610	609
6460	41	89	0	0	0	0	0	0
6480	105	80	24	0	0	0	220	64
6495	279	0	0	0	0	0	151	521
6500	0	0	0	0	0	0	68	0
6511	137	0	0	0	0	3	153	0
6512	0	0	0	0	0	0	0	312
6514	0	0	0	0	0	0	0	0
6516	201	0	0	0	0	39	50	71
6519	388	324	0	0	58	10	76	200
6521	165,513	76,002	3,893	1,181	14,225	10,221	88,058	99,247
6522	26,211	10,088	478	148	2,130	947	11,352	11,866
6523	40,901	28,542	3,178	1,327	10,472	4,900	25,277	54,453
6570	295	0	20	0	23	0	423	46
6580	464	71	48	0	0	0	66	137
6610	436	91	71	0	24	0	145	132
6620	310	41	26	0	0	4	71	64
6630	9,967	3,511	367	156	1,066	146	4,179	3,912
6640	38	0	0	0	0	3	0	0
6650	224	0	0	0	0	3	0	118
6660	105	0	0	0	0	0	0	0
Total Other	255,809	121,431	8,495	2,944	28,456	16,423	132,065	174,104
Grand Total	1,069,834	445,858	23,719	8,666	81,666	46,373	662,170	676,538

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	ocr/	bcs/	LD41	LD42	priority	express	Registry	LD15
1st L&P	67,211	189,076	3,302	441	3,126	591	457	124,751
PvtCds	1,529	3,786	0	8	28	28	19	3,636
PostalCds	46	0	0	0	0	0	0	0
PreL	15,228	90,809	2,265	55	272	110	0	26,237
PreCds	405	1,929	42	10	0	0	0	3,784
Priority	0	111	0	9	32,719	520	36	0
Express	0	39	0	0	540	7,999	86	0
2nd IC	0	0	0	0	0	0	0	0
2nd NP	54	177	0	0	0	0	0	0
2nd CL	0	0	0	0	0	0	0	0
2nd Reg	95	285	35	29	233	54	19	0
3rd SP	192	1,274	49	20	191	54	0	1,484
BRCRT	1,324	4,619	108	16	101	0	0	6,160
BRO	6,988	40,968	721	279	187	55	6	15,976
NPCRT	398	1,165	31	14	0	0	0	0
NPO	3,047	13,427	163	32	28	27	0	5,565
4th ZPP	0	0	0	12	159	0	5	0
BPM	0	0	0	0	40	0	1	0
SPC	49	0	0	11	73	14	10	0
LIB	0	0	0	0	0	0	0	0
Mailgrams	0	0	0	0	0	0	0	0
Free	0	0	34	0	25	0	0	0
Intl	1,428	1,490	0	0	728	628	87	4,982
USPS	223	395	0	11	1,439	292	137	3,448
Registry	114	0	0	0	34	57	5,646	0
Certified	0	0	0	0	0	0	26	0
Insurance	0	0	0	0	0	0	0	0
COD	0	0	0	0	0	0	0	0
Sp Delvry	0	0	0	0	0	28	0	0
Oth SSv	501	681	0	0	97	0	131	3,723
Total Direct Mail	98,832	350,232	6,750	947	40,022	10,457	6,667	199,746
Mixed Mail								
5301	0	0	0	0	70	0	0	0
5302	0	0	0	0	344	1	0	0
5303	0	0	0	0	0	39	0	0
5331	0	0	0	0	0	0	0	0
5340	0	66	0	0	0	0	0	0
5341	0	0	0	0	0	0	0	0
5345	0	0	0	0	0	0	0	0
5460	0	99	0	0	0	38	7	0
5461	0	0	0	0	0	10	1	0
5610	30,334	124,787	5,734	132	547	112	70	57,332
5620	90	111	32	100	335	130	28	0
5700	0	137	0	0	6,920	215	16	0
5750	1,243	4,737	519	65	17,128	3,306	1,525	37,134
Total Mixed Mail	31,666	129,938	6,286	297	25,345	3,850	1,647	94,466
Other								
5020	0	0	0	0	0	0	0	0
5040	84	0	0	20	65	14	45	0
5050	0	0	0	0	0	0	9	0
5060	0	0	0	0	0	0	0	0
5070	0	0	0	0	31	0	0	0
5080	0	54	0	0	0	0	0	0
5090	0	0	0	0	0	0	0	0
5110	0	0	0	0	0	0	0	0
5120	0	0	0	0	0	0	0	0
5130	0	0	0	0	0	0	11	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	ocr/	bcs/	LD41	LD42	priority	express	Registry	LD15
5170	37	0	0	0	27	54	18	0
5180	0	0	0	0	0	0	0	0
6000	0	0	0	0	0	0	0	0
6010	74	43	0	10	33	161	64	0
6020	0	0	0	0	0	0	0	0
6030	0	0	0	0	32	0	9	0
6040	0	0	0	0	0	0	7	0
6045	0	45	0	0	0	20	0	0
6050	0	0	0	0	0	0	0	0
6070	0	0	0	0	0	0	0	0
6073	0	0	0	0	0	0	0	0
6080	0	0	0	0	0	0	0	0
6110	0	0	0	0	0	0	0	0
6120	0	0	0	0	0	0	0	0
6130	0	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0	0
6170	0	58	0	51	101	37	75	0
6180	0	0	0	0	0	0	0	0
6200	0	0	0	0	0	0	0	0
6210	0	243	53	14	372	149	53	0
6220	0	0	0	0	43	51	10	0
6230	0	0	0	0	115	129	6,566	0
6231	0	58	0	11	513	12,049	102	638
6240	0	62	0	0	123	0	28	0
6270	0	0	0	0	0	0	0	0
6320	0	0	0	29	0	25	27	0
6330	38	0	0	0	31	13	26	0
6420	54	318	0	0	2	8	45	1,712
6430	175	787	32	0	107	38	24	0
6460	0	64	0	0	0	0	0	0
6480	94	124	0	0	95	29	0	0
6495	46	0	0	0	110	0	9	0
6500	0	58	0	0	0	0	0	0
6511	0	182	123	0	2	0	0	3,037
6512	0	0	0	0	0	0	0	0
6514	0	0	0	0	0	0	0	0
6516	0	0	0	0	2	0	10	4,212
6519	128	258	32	0	118	0	10	0
6521	24,463	86,838	1,711	354	17,353	5,544	2,396	50,470
6522	3,255	10,682	309	16	2,162	635	234	3,684
6523	15,525	58,568	1,008	133	11,136	1,413	739	18,013
6570	77	261	0	0	0	0	11	0
6580	0	66	0	0	28	0	55	0
6610	0	0	0	0	12	7	0	0
6620	89	223	34	0	57	35	59	2,025
6630	1,584	4,661	535	66	1,433	655	455	5,535
6640	0	0	0	0	0	0	0	0
6650	0	0	0	0	174	39	0	0
6660	0	62	0	0	40	43	13	0
Total Other	45,721	163,715	3,837	702	34,318	21,148	11,109	89,327
Grand Total	176,220	643,885	16,873	1,946	99,685	35,456	19,423	383,539

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Bus Reply	REWRAP	MAILGRAM	LD48 Exp	LD48_Adm	LD48 Sp Serv	LD48 Oth	LD49
1st L&P	3,721	1,993	0	35	0	1,336	1,800	43,364
PvtCds	263	110	0	0	0	36	115	2,946
PostalCds	0	54	0	0	0	0	0	0
PreL	504	49	0	0	0	266	622	32,488
PreCds	73	0	0	0	0	0	13	1,106
Priority	107	515	0	0	0	171	245	880
Express	52	0	0	228	0	410	63	0
2nd IC	0	0	0	0	0	0	0	358
2nd NP	0	0	0	0	0	19	31	3,071
2nd CL	0	0	0	0	0	0	0	0
2nd Reg	0	60	0	0	0	44	128	11,378
3rd SP	111	58	0	0	0	26	33	4,212
BRCRT	0	0	0	0	0	80	239	1,190
BRO	157	379	0	0	0	223	351	4,759
NPCRT	0	0	0	0	0	0	52	161
NPO	49	0	0	0	0	8	72	717
4th ZPP	52	0	41	0	0	9	84	338
BPM	54	0	0	0	0	16	7	1,082
SPC	0	0	0	0	0	37	46	158
LIB	0	0	0	0	0	0	0	43
Mailgrams	0	0	0	0	0	0	0	0
Free	0	0	0	0	0	0	0	120
Intl	161	127	0	0	0	77	0	472
USPS	147	0	0	0	0	85	60	6,734
Registry	48	0	39	7	0	640	165	0
Certified	422	0	0	0	0	695	323	0
Insurance	0	0	0	0	0	0	8	0
COD	0	0	0	0	0	22	21	0
Sp Delvry	0	0	0	0	0	52	9	0
Oth SSv	7,056	0	0	0	0	993	500	6,155
Total Direct Mail	12,977	3,345	80	271	0	5,247	4,985	121,731
Mixed Mail								
5301	0	0	0	0	0	0	19	0
5302	0	0	0	0	0	0	0	0
5303	0	0	0	0	0	0	0	0
5331	0	0	0	0	0	0	0	0
5340	0	0	0	0	0	0	0	475
5341	0	0	0	0	0	0	0	0
5345	0	0	0	0	0	0	0	0
5460	0	0	0	0	0	0	0	0
5461	0	0	0	0	0	0	0	0
5610	472	489	0	0	0	207	398	693
5620	0	0	0	0	0	53	118	53
5700	107	302	0	0	0	25	78	0
5750	1,310	2,205	78	43	0	556	1,392	4,516
Total Mixed Mail	1,889	2,996	78	43	0	842	2,004	5,737
Other								
5020	0	0	0	0	0	0	29	0
5040	0	0	27	0	0	129	339	0
5050	0	0	0	0	0	10	0	0
5060	0	0	0	0	0	0	8	0
5070	0	0	0	15	0	0	23	0
5080	0	0	0	0	0	10	15	0
5090	0	0	0	0	0	8	0	0
5110	0	0	0	0	0	10	0	0
5120	0	0	0	0	0	0	8	0
5130	0	0	0	0	0	0	0	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Bus Reply	REWRAP	MAILGRAM	LD48 Exp	LD48_Adm	LD48 Sp Serv	LD48 Oth	LD49
5170	0	0	0	0	0	19	23	41
5180	0	0	0	0	0	0	0	0
6000	0	0	0	0	0	83	93	0
6010	0	0	0	16	0	145	337	0
6020	0	0	0	0	0	72	150	0
6030	0	0	0	0	0	44	61	0
6040	0	0	0	0	0	8	34	0
6045	0	0	0	0	0	10	32	0
6050	0	0	0	0	0	10	0	0
6070	0	0	0	0	0	0	16	0
6073	0	0	0	0	0	19	17	0
6080	0	0	0	0	0	0	8	0
6110	0	0	0	0	0	16	13	0
6120	0	0	0	0	0	0	16	0
6130	0	0	0	0	0	9	18	0
6140	0	0	0	0	0	0	7	0
6170	0	0	0	0	0	493	1,075	51
6180	0	0	0	0	0	9	47	0
6200	0	0	0	0	0	20	92	0
6210	64	0	0	0	0	50	73	43
6220	0	0	0	68	0	312	34	42
6230	146	0	0	78	0	854	193	0
6231	0	0	0	491	0	399	103	0
6240	55	1,261	0	0	0	74	168	93
6270	0	0	0	0	0	0	0	0
6320	49	0	0	0	0	19	352	0
6330	0	113	0	50	0	43	154	140
6420	0	277	39	0	0	283	225	245
6430	0	47	0	0	0	2,215	415	91
6460	0	0	0	0	0	17	22	0
6480	0	0	0	20	0	0	9	120
6495	55	55	0	0	0	0	15	0
6500	0	0	0	0	0	0	0	0
6511	0	0	0	0	0	0	0	43
6512	0	0	0	0	0	0	0	0
6514	0	0	0	0	0	0	0	0
6516	0	0	0	0	0	0	26	49
6519	55	0	0	0	0	18	112	49
6521	3,235	2,368	0	130	0	1,594	2,190	32,846
6522	369	233	0	28	0	179	358	4,067
6523	657	634	41	14	0	394	1,371	5,615
6570	0	0	0	0	0	36	436	55,458
6580	4,763	63	0	0	0	934	337	160
6610	0	0	0	0	0	12	76	0
6620	150	0	0	102	0	128	347	0
6630	516	854	29	116	0	1,304	2,699	2,777
6640	0	0	0	0	0	8	33	0
6650	0	0	0	0	0	187	273	0
6660	0	0	0	0	0	18	43	220
Total Other	10,114	5,904	136	1,128	0	10,204	12,523	102,150
Grand Total	24,981	12,245	293	1,441	0	16,292	19,512	229,618

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	LD79	LD44	LD43	1Platfrm	10Ppref	10Pbulk	1POUCHING	1SackS_h	1SackS_m
1st L&P	1,099	34,506	75,961	18,800	75,803	14,098	49,875	3,409	1,191
PvtCds	156	646	1,723	53	948	279	812	85	0
PostalCds	0	0	41	0	8	0	106	0	0
PreL	2,580	10,394	19,049	4,187	18,093	2,904	10,368	994	179
PreCds	150	41	359	92	241	120	391	0	0
Priority	269	2,053	12,742	6,884	12,686	1,703	7,997	2,013	545
Express	0	405	1,359	1,061	653	114	562	173	0
2nd IC	69	82	449	93	216	63	63	133	6
2nd NP	77	243	1,575	792	2,905	611	1,210	512	512
2nd CL	0	0	42	9	106	116	59	4	5
2nd Reg	204	1,874	9,655	5,879	17,613	4,267	5,268	2,512	1,419
3rd SP	166	38	1,403	638	909	830	554	113	10
BRCRT	982	788	12,676	3,068	4,507	6,105	1,569	1,036	326
BRO	4,920	6,787	28,411	8,171	19,521	33,032	13,103	2,802	1,407
NPCRT	194	91	1,553	134	235	877	151	146	59
NPO	2,317	1,069	5,640	1,373	4,857	7,459	2,408	528	364
4th ZPP	77	89	4,279	3,613	1,091	625	433	722	585
BPM	0	147	1,975	554	845	388	280	155	69
SPC	0	209	2,122	819	481	333	373	125	175
LIB	0	0	358	66	143	62	371	53	0
Mailgrams	0	0	0	0	0	0	0	0	0
Free	0	0	307	93	457	0	280	79	0
Intl	50	173	1,168	1,825	1,644	240	2,855	182	424
USPS	254	312	1,195	551	1,474	54	922	162	0
Registry	58	356	1,166	390	515	0	180	0	0
Certified	0	0	2,034	53	0	0	0	0	0
Insurance	0	0	115	0	0	0	0	0	0
COD	0	0	312	0	0	0	0	0	0
Sp Delvry	0	0	0	44	0	0	0	0	0
Oth SSv	36	292	2,052	90	453	258	235	107	0
Total Direct Mail	13,658	60,593	189,763	59,334	166,403	74,537	100,422	16,046	7,276
Mixed Mail									
5301	0	40	34	299	451	0	75	0	0
5302	0	0	60	269	75	0	367	134	157
5303	0	0	0	147	0	0	79	0	0
5331	0	0	0	50	29	87	0	75	64
5340	86	39	370	139	868	236	257	65	52
5341	0	0	38	263	24	25	77	43	129
5345	0	0	22	268	0	0	0	0	0
5460	0	45	0	116	159	0	50	0	60
5461	0	0	3	16	19	0	0	10	161
5610	212	6,058	26,358	10,053	32,614	11,388	31,921	1,167	258
5620	0	487	8,289	5,013	9,367	6,517	10,867	799	0
5700	70	273	7,104	5,972	5,539	2,154	2,460	1,422	1,304
5750	3,479	6,643	34,729	293,972	113,458	46,510	86,206	33,592	18,292
Total Mixed Mail	3,847	13,584	77,008	316,576	162,604	66,919	132,359	37,306	20,478
Other									
5020	0	84	37	0	0	0	0	0	0
5040	0	854	4,879	41	59	0	0	34	113
5050	0	0	120	0	0	0	0	0	0
5060	0	0	0	0	0	0	0	0	0
5070	0	61	101	0	0	0	0	0	0
5080	0	164	327	0	0	0	0	35	0
5090	0	0	0	0	0	0	0	0	0
5110	0	38	144	0	0	0	0	0	0
5120	0	0	0	0	0	0	0	0	0
5130	0	0	111	0	0	0	0	0	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	LD79	LD44	LD43	1Platform	10Ppref	10Pbulk	1POUCHING	1SackS_h	1SackS_m
5170	229	85	466	0	0	0	0	0	0
5180	90	0	0	0	0	0	0	0	0
6000	163	368	481	120	0	0	0	0	0
6010	190	650	2,702	156	63	198	0	0	0
6020	0	1,853	633	0	0	0	0	0	57
6030	36	805	642	51	0	0	0	0	0
6040	0	0	506	45	0	0	0	0	0
6045	0	0	84	35	0	0	0	41	0
6050	0	0	0	0	0	0	0	0	0
6070	36	40	337	0	0	0	0	0	0
6073	0	0	41	0	0	0	43	0	0
6080	0	0	129	0	0	0	0	0	0
6110	0	91	153	0	0	0	0	0	0
6120	34	91	41	0	0	0	0	0	0
6130	0	38	36	0	0	0	0	0	0
6140	0	0	0	0	0	0	0	0	0
6170	507	1,418	3,571	346	78	92	114	0	0
6180	0	85	45	0	0	0	0	0	0
6200	0	195	284	0	0	0	0	0	0
6210	35,981	157	1,962	26,050	1,734	483	1,316	2,085	1,080
6220	0	0	95	0	104	0	113	0	0
6230	91	77	1,571	201	318	113	294	36	0
6231	180	38	1,140	675	755	17	661	110	0
6240	0	214	1,516	190	362	44	264	0	0
6270	0	0	0	0	0	0	0	0	0
6320	0	80	701	342	253	195	169	0	0
6330	1,253	149	505	145	51	0	120	0	0
6420	762	376	1,271	583	298	111	3	41	0
6430	127	351	4,643	826	585	98	224	68	59
6460	611	55	0	23	157	0	0	0	0
6480	1,102	0	89	119	496	0	331	0	91
6495	0	0	88	0	0	0	111	0	0
6500	0	0	51	97	0	0	0	0	0
6511	0	0	50	0	0	0	0	0	0
6512	0	0	35	0	0	0	0	0	0
6514	0	0	0	0	0	0	0	0	0
6516	0	38	37	139	102	116	143	0	0
6519	883	39	571	734	612	228	323	38	0
6521	8,297	11,364	68,350	101,567	94,884	42,537	62,803	16,719	9,349
6522	1,514	1,538	7,852	14,254	15,019	7,569	8,610	2,108	1,010
6523	2,607	4,338	40,752	110,944	81,148	36,552	50,520	13,082	7,189
6570	41	145	791	0	37	0	0	0	0
6580	364	331	1,633	53	318	114	112	0	0
6610	439	0	37	415	445	56	97	80	0
6620	663	259	841	932	474	62	19	75	0
6630	24,598	2,907	9,000	11,911	9,176	3,425	3,863	1,111	640
6640	0	40	338	93	53	0	0	0	0
6650	69	271	863	102	53	0	0	0	0
6660	56	75	256	156	53	0	0	0	0
Total Other	80,924	29,764	160,917	271,347	207,688	92,010	130,254	35,665	19,587
Grand Total	98,430	103,942	427,637	647,257	536,694	233,465	363,035	89,017	47,341

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	1Bulk pr	1CancMP P	1SCAN	1EEQMT	Window	1SUP_AD M	1SUP Oth	1MISC	INTL
1st L&P	528	74,628	2,398	264	0	2,940	0	5,899	3,858
PvtCds	25	1,807	4	0	0	79	0	259	137
PostalCds	0	37	0	0	0	0	0	0	0
PreL	1,010	2,590	784	0	0	493	0	418	514
PreCds	67	75	0	0	0	30	0	109	0
Priority	93	2,833	4,051	0	0	76	0	489	755
Express	0	40	845	54	0	106	0	182	396
2nd IC	0	2	0	57	0	28	0	2	3
2nd NP	0	43	0	0	0	0	0	125	12
2nd CL	0	0	0	0	0	0	0	1	0
2nd Reg	69	381	96	68	0	29	0	165	356
3rd SP	72	501	49	0	0	42	0	129	63
BRCRT	140	332	53	0	0	86	0	124	42
BRO	149	1,079	108	375	0	461	0	807	531
NPCRT	0	40	0	0	0	0	0	49	0
NPO	181	516	0	0	0	33	0	449	155
4th ZPP	0	402	3	62	0	125	0	129	80
BPM	31	72	59	0	0	0	0	14	0
SPC	0	76	0	0	0	0	0	0	0
LIB	0	74	0	0	0	0	0	0	15
Mailgrams	0	0	0	0	0	0	0	0	0
Free	0	76	0	51	0	0	0	0	69
Intl	4	948	65	0	0	92	0	610	28,611
USPS	0	640	12	0	0	221	0	387	136
Registry	0	0	176	0	0	197	0	375	3,236
Certified	0	0	0	0	0	109	0	72	34
Insurance	0	0	0	0	0	0	0	0	0
COD	0	0	0	0	0	75	0	0	0
Sp Delvry	0	0	0	0	0	2	0	0	0
Oth SSv	0	1,529	56	0	0	341	0	463	10
Total Direct Mail	2,368	88,721	8,761	930	0	5,566	0	11,258	39,014
Mixed Mail									
5301	0	35	123	0	0	0	0	0	0
5302	0	0	87	0	0	0	0	65	24
5303	0	0	84	0	0	0	0	0	16
5331	0	40	1	0	0	0	0	0	0
5340	0	29	0	0	0	0	0	0	0
5341	0	0	1	0	0	0	0	0	0
5345	0	0	0	0	0	0	0	0	0
5460	0	38	0	0	0	0	0	0	291
5461	0	0	0	0	0	0	0	0	295
5610	200	13,889	528	60	0	1,139	0	6,085	2,998
5620	0	2,096	200	59	0	270	0	2,057	1,187
5700	107	217	319	252	0	79	0	296	1,854
5750	1,766	30,017	20,410	5,430	0	4,788	0	17,618	11,967
Total Mixed Mail	2,073	46,361	21,753	5,801	0	6,275	0	26,121	18,632
Other									
5020	0	0	0	0	0	0	0	0	0
5040	209	227	44	0	0	386	0	80	438
5050	0	0	0	0	0	0	0	0	38
5060	0	0	0	0	0	0	0	0	0
5070	0	0	0	0	0	34	0	0	0
5080	43	0	0	0	0	0	0	0	38
5090	0	0	0	0	0	0	0	0	0
5110	0	0	0	0	0	0	0	0	0
5120	0	0	0	0	0	0	0	0	0
5130	0	0	0	0	0	0	0	0	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	1Bulk pr	1CancMP P	1SCAN	1EEQMT	Window	1SUP_AD M	1SUP Oth	1MISC	INTL
5170	0	0	0	0	0	63	0	0	0
5180	0	0	0	0	0	0	0	0	0
6000	0	37	0	0	0	34	0	0	71
6010	85	97	0	0	0	321	0	312	225
6020	0	46	0	0	0	0	0	57	0
6030	0	0	0	0	0	30	0	57	73
6040	57	0	0	0	0	70	0	44	116
6045	0	0	0	0	0	0	0	0	0
6050	0	0	0	0	0	0	0	0	0
6070	0	0	0	0	0	0	0	0	0
6073	0	0	0	0	0	0	0	0	0
6080	0	0	0	0	0	48	0	0	0
6110	0	0	0	0	0	0	0	0	0
6120	0	0	0	0	0	56	0	0	0
6130	0	0	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0	0	0
6170	95	92	0	0	0	407	0	398	490
6180	0	0	0	0	0	0	0	0	0
6200	26	0	0	0	0	0	0	0	39
6210	96	485	1,527	122	0	386	0	461	1,262
6220	0	0	0	0	0	0	0	57	0
6230	0	116	67	63	0	278	0	310	1,121
6231	0	38	408	107	0	119	0	794	2,177
6240	0	1,246	54	19	0	370	0	1,202	21
6270	0	0	0	0	0	0	0	0	0
6320	0	0	0	286	0	412	0	513	52
6330	0	178	0	0	0	212	0	491	43
6420	0	35	52	242	0	415	0	671	178
6430	70	149	90	0	0	643	0	1,818	195
6460	0	0	0	59	0	48	0	44	0
6480	0	45	0	49	0	764	0	2,096	119
6495	62	0	0	75	0	156	0	257	49
6500	0	40	0	0	0	715	0	504	0
6511	0	0	0	0	0	81	0	65	5
6512	0	0	0	0	0	41	0	66	0
6514	0	0	0	0	0	0	0	63	0
6516	0	0	3	57	0	245	0	200	0
6519	25	108	58	182	0	1,969	0	2,682	157
6521	1,754	28,707	8,135	3,670	0	5,262	0	10,337	13,321
6522	152	3,157	790	550	0	1,238	0	1,456	974
6523	993	14,959	4,168	25,128	0	1,240	0	6,516	4,886
6570	0	114	63	91	0	564	0	346	69
6580	0	544	0	0	0	915	0	789	42
6610	0	141	20	51	0	6,067	0	4,193	146
6620	0	174	813	135	0	1,508	0	804	398
6630	333	2,338	1,304	1,425	0	67,852	0	26,296	2,112
6640	0	0	0	0	0	566	0	76	0
6650	31	0	0	117	0	1,466	0	598	172
6660	0	0	0	51	0	1,040	0	705	5
Total Other	4,029	53,073	17,595	32,478	0	96,023	0	65,358	29,029
Grand Total	8,470	188,154	48,109	39,210	0	107,864	0	102,737	86,675

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Total MODS	SSM	Allied	PSM	SPB	NMO	Platform	Total BMCs
1st L&P	1,897,267	70	841	444	521	0	98	1,974
PvtCds	59,944	0	36	0	0	0	0	36
PostalCds	1,047	0	0	0	0	0	0	0
PreL	388,735	70	0	0	102	0	59	231
PreCds	17,634	0	0	0	0	0	0	0
Priority	119,829	0	230	275	52	40	65	662
Express	16,760	0	0	0	0	0	8	8
2nd IC	4,188	7	5	0	9	0	8	29
2nd NP	25,191	360	334	1	296	0	316	1,307
2nd CL	1,072	66	104	0	2	0	69	242
2nd Reg	137,847	2,402	1,179	68	646	129	1,164	5,587
3rd SP	24,611	204	1,716	1,845	693	40	491	4,989
BRCRT	67,151	1,498	1,815	526	876	214	1,341	6,270
BRO	487,308	6,677	15,656	17,819	11,620	1,903	5,406	59,080
NPCRT	7,854	58	225	61	82	40	95	561
NPO	131,545	987	2,839	1,056	2,347	292	811	8,331
4th ZPP	17,078	1,859	8,120	9,723	2,293	3,848	4,551	30,394
BPM	9,284	460	3,275	8,299	799	619	1,522	14,974
SPC	7,325	688	3,556	12,477	1,066	496	1,233	19,517
LIB	2,137	209	740	1,851	175	580	398	3,953
Mailgrams	49	0	0	0	0	0	0	0
Free	2,635	0	204	448	201	0	30	883
Intl	72,364	758	3,276	3,888	1,449	345	860	10,576
USPS	28,097	115	400	287	154	338	197	1,491
Registry	14,153	0	130	0	0	0	0	130
Certified	3,768	0	0	0	0	0	0	0
Insurance	123	0	10	0	0	0	0	10
COD	429	0	0	0	0	0	0	0
Sp Delvry	135	0	0	0	0	0	0	0
Oth SSV	34,198	0	104	54	0	0	8	166
Total Direct Mail	3,579,758	16,487	44,795	59,120	23,382	8,884	18,730	171,399
Mixed Mail								
5301	1,281	0	36	0	0	0	0	36
5302	1,824	0	0	0	0	0	0	0
5303	366	0	0	0	0	0	0	0
5331	388	70	0	0	14	0	34	118
5340	6,580	70	179	0	154	0	0	403
5341	709	70	44	0	57	0	281	452
5345	290	0	114	0	0	0	70	183
5460	1,264	137	107	145	85	87	127	688
5461	514	0	81	115	15	0	59	270
5610	544,402	0	1,535	0	0	0	95	1,630
5620	196,879	0	675	0	0	0	131	806
5700	46,108	0	8,701	15,399	1,457	3,736	1,074	30,367
5750	866,454	12,580	44,334	0	13,034	3,619	52,186	125,752
Total Mixed Mail	1,667,060	12,927	55,805	15,659	14,816	7,442	54,055	160,704
Other								
5020	335	0	0	0	0	0	0	0
5040	9,238	0	0	0	0	0	0	0
5050	176	0	0	0	0	0	0	0
5060	8	0	0	0	0	0	0	0
5070	266	0	0	0	0	0	0	0
5080	835	0	0	0	0	0	0	0
5090	8	0	0	0	0	0	0	0
5110	191	0	0	0	0	0	0	0
5120	8	0	0	0	0	0	0	0
5130	122	0	0	0	0	0	0	0

Third attachment, Response to TW/USPS-T12-3

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Total MODS	SSM	Allied	PSM	SPB	NMO	Platform	Total BMCs
5170	1,355	0	0	0	0	0	0	0
5180	90	0	0	0	0	0	0	0
6000	1,704	0	0	0	0	0	0	0
6010	6,719	0	0	0	0	0	0	0
6020	3,714	0	0	0	0	0	0	0
6030	2,381	0	0	0	0	0	0	0
6040	887	0	0	0	0	0	0	0
6045	266	0	0	0	0	0	0	0
6050	63	0	0	0	0	0	0	0
6070	429	0	0	0	0	0	0	0
6073	119	0	0	0	0	0	0	0
6080	185	0	0	0	0	0	0	0
6110	273	0	0	0	0	0	0	0
6120	237	0	0	0	0	0	0	0
6130	101	0	0	0	0	0	0	0
6140	7	0	0	0	0	0	0	0
6170	10,678	0	0	0	0	0	0	0
6180	248	0	0	0	0	0	0	0
6200	759	0	0	0	0	0	0	0
6210	77,738	0	0	0	0	0	4,773	4,773
6220	1,007	0	0	0	0	0	0	0
6230	13,851	0	115	0	0	0	0	115
6231	22,669	0	33	0	0	0	0	33
6240	11,879	0	668	0	0	0	0	668
6270	0	0	0	0	0	0	0	0
6320	3,702	0	0	0	0	0	0	0
6330	4,248	0	0	0	0	0	0	0
6420	8,902	0	404	0	0	0	0	404
6430	17,352	0	35	0	0	0	0	35
6460	1,229	0	0	0	0	0	0	0
6480	6,285	0	0	0	0	0	0	0
6495	2,040	0	0	0	0	0	0	0
6500	1,533	0	0	0	0	0	0	0
6511	3,883	0	0	0	0	0	0	0
6512	455	0	0	0	0	0	0	0
6514	63	0	0	0	0	0	0	0
6516	5,741	0	0	0	0	0	0	0
6519	10,446	0	0	0	0	0	0	0
6521	1,176,887	0	0	0	0	0	101	101
6522	157,220	0	0	0	0	0	0	0
6523	689,331	1,076	23,309	919	8,385	3,316	15,807	52,811
6570	59,347	0	74	0	0	0	0	74
6580	12,407	0	39	0	0	0	0	39
6610	13,191	0	0	0	0	0	0	0
6620	10,921	0	0	0	0	0	0	0
6630	214,814	0	0	0	0	0	0	0
6640	1,250	0	0	0	0	0	0	0
6650	4,759	0	0	0	0	0	0	0
6660	2,952	0	0	0	0	0	0	0
Total Other	2,577,505	1,076	24,678	919	8,385	3,316	20,682	59,055
Grand Total	7,824,322	30,490	125,278	75,698	46,583	19,642	93,467	391,158

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Outgoing	Incoming	Transit	Other	Total Non-MODS	Grand Total
1st L&P	73,921	430,955	2,390	59,660	566,926	2,466,167
PvtCds	2,025	14,278	134	1,898	18,335	78,315
PostalCds	165	408	0	42	615	1,662
PreL	14,433	121,113	1,103	13,139	149,788	538,754
PreCds	739	4,119	88	498	5,445	23,079
Priority	4,498	32,159	0	4,919	41,576	162,067
Express	1,394	5,350	371	976	8,091	24,858
2nd IC	340	2,965	0	200	3,505	7,722
2nd NP	527	8,497	43	914	9,981	36,478
2nd CL	1	739	0	47	787	2,101
2nd Reg	4,698	49,082	0	5,127	58,907	202,342
3rd SP	1,785	5,389	0	829	8,003	37,603
BRCRT	2,700	41,033	0	2,931	46,664	120,085
BRO	18,703	167,059	205	17,380	203,347	749,735
NPCRT	242	3,173	26	317	3,757	12,172
NPO	4,172	32,971	304	4,332	41,778	181,653
4th ZPP	853	8,376	160	814	10,203	57,674
BPM	650	6,178	130	458	7,416	31,673
SPC	478	4,167	68	362	5,076	31,918
LIB	353	554	0	87	994	7,084
Mailgrams	0	0	0	1	1	50
Free	174	319	0	92	585	4,103
Intl	1,576	2,593	13	2,112	6,295	89,235
USPS	2,407	6,540	69	979	9,996	39,583
Registry	829	4,641	78	1,424	6,973	21,256
Certified	849	8,825	0	528	10,202	13,970
Insurance	44	355	0	16	415	547
COD	68	1,014	0	55	1,137	1,566
Sp Delvry	0	0	0	11	11	146
Oth SSv	1,965	13,116	0	1,496	16,576	50,940
Total Direct Mail	140,589	975,966	5,183	121,646	1,243,385	4,994,541
Mixed Mail						
5301	143	145	0	47	335	1,652
5302	14	95	0	59	169	1,993
5303	0	0	0	11	11	377
5331	38	86	0	16	140	645
5340	255	2,483	0	248	2,986	9,969
5341	0	155	0	25	181	1,342
5345	0	57	0	10	67	540
5460	13	43	0	39	96	2,047
5461	14	0	0	16	30	814
5610	13,346	66,769	256	15,063	95,434	641,465
5620	4,028	24,986	0	5,634	34,648	232,334
5700	1,992	11,838	0	1,907	15,737	92,213
5750	42,322	89,311	1,591	29,216	162,440	1,154,646
Total Mixed Mail	62,167	195,970	1,847	52,290	312,274	2,140,038
Other						
5020	0	0	0	17	17	352
5040	0	0	0	436	436	9,674
5050	0	0	0	9	9	185
5060	0	0	0	1	1	9
5070	0	0	0	18	18	283
5080	0	0	0	34	34	869
5090	0	0	0	2	2	10
5110	0	0	0	9	9	200
5120	0	0	0	9	9	17
5130	0	0	0	5	5	127

Costs from USPS-T12, Table 6, by cost pool and subclass/activity code

Subclass/Activity Code	Outgoing	Incoming	Transit	Other	Total Non-MODS	Grand Total
5170	0	0	0	50	50	1,405
5180	0	0	0	3	3	92
6000	0	0	0	97	97	1,801
6010	0	0	0	318	318	7,037
6020	0	0	0	151	151	3,866
6030	0	0	0	105	105	2,486
6040	0	0	0	48	48	935
6045	0	0	0	20	20	286
6050	0	0	0	5	5	68
6070	0	0	0	27	27	456
6073	0	0	0	15	15	134
6080	0	0	0	13	13	198
6110	0	0	0	12	12	285
6120	0	0	0	24	24	261
6130	0	0	0	8	8	109
6140	0	0	0	1	1	9
6170	0	0	0	804	804	11,481
6180	0	0	0	14	14	263
6200	0	0	0	49	49	808
6210	14,156	6,313	690	3,186	24,345	106,856
6220	90	13	341	88	533	1,540
6230	1,379	7,407	87	1,852	10,725	24,692
6231	1,213	2,498	105	1,242	5,058	27,760
6240	1,751	4,864	0	677	7,292	19,838
6270	0	0	0	2	2	2
6320	0	0	0	210	210	3,912
6330	0	0	0	208	208	4,455
6420	0	3,887	0	665	4,552	13,858
6430	1,051	13,157	0	1,632	15,840	33,228
6460	0	0	0	47	47	1,276
6480	66	0	0	191	257	6,542
6495	0	0	0	65	65	2,105
6500	0	0	0	49	49	1,582
6511	0	0	0	26	26	3,909
6512	0	0	0	11	11	465
6514	0	0	0	2	2	65
6516	0	0	0	51	51	5,792
6519	0	0	0	329	329	10,775
6521	0	0	0	36,326	36,326	1,213,314
6522	0	0	0	4,353	4,353	161,573
6523	25,199	83,296	1,439	22,249	132,182	874,325
6570	1,410	3,303	320	1,883	6,915	66,336
6580	267	8,876	0	951	10,094	22,540
6610	0	0	0	468	468	13,660
6620	0	0	0	461	461	11,382
6630	0	0	0	8,078	8,078	222,892
6640	0	0	0	77	77	1,326
6650	0	0	0	415	415	5,174
6660	0	0	0	118	118	3,070
Total Other	46,582	133,613	2,981	88,215	271,392	2,907,951
Grand Total	249,338	1,305,550	10,011	262,151	1,827,050	10,042,530

Response of United States Postal Service Witness Degen
to Interrogatories of Time Warner

TW/USPS-T12-4.

- a. Please provide a precise definition of the terms "not-handling tallies", "not-handling-mail costs" and "not handling costs" as the terms are used in your testimony and in LR-H-146. In particular, specify the IOCS activity codes corresponding to these terms. If there are cases when an IOCS activity code may or may not indicate a not-handling tally, please explain fully.
- b. If on a tally taken at a MODS office the IOCS activity code is 5610 (mixed letters) and the MODS number is 175 (manual flats incoming secondary), which cost pool will the tally be assigned to?
- c. If on a tally taken at a MODS office the IOCS activity code is 5620 (mixed flats) and the MODS number is 060 (manual letters outgoing primary), which cost pool will the tally be assigned to?
- d. If on a tally taken at a MODS office the IOCS activity code is 5750 (mixed all shapes) and the tally does not have a valid MODS number, which cost pool will the tally be assigned to?
- e. If on a tally taken at a MODS office the IOCS activity code is 6521 (breaks, personal needs) and the tally does not have a valid MODS numbers, which cost pool will the tally be assigned to?

TW/USPS-T12-4. Response:

- a. Please see LR-H-146, at II-7, for a formal definition of handling and not-handling tally categories. Also see the source code to program MOD1DIR, lines 12-32. As employed in the testimony (see USPS-T-12, at 10) and LR-H-146, the terms "not-handling-mail costs" and "not handling costs" generally refer to dollar weights of IOCS not-handling tallies. The "distributed not-handling costs" for a given cost pool are the distributed IOCS tally dollars for the not-handling-mail tallies associated

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with the cost pool and are used to form distribution keys for the cost pool dollars. The first attachment to the response to TW/USPS-T12-3 lists the activity codes observed in tallies classified as not-handling-mail under the new methodology.

- b. A tally with MODS number 175 will be assigned to the manual flats cost pool. The IOCS activity code is not used to assign tallies to cost pools. The 5610 activity code is assigned based on the IOCS Question 19 response which, as discussed in the response to TW/USPS-T12-2, should not have precedence over the MODS operation number.
- c. A tally with MODS number 060 will be assigned to the manual letters cost pool.
- d. The cost pool cannot be determined from the scenario described. When no MODS number is associated with a tally, the cost pool assignment is based on IOCS Question 19 responses, if possible. See the source code to program MOD1POOL, lines 297001-413001 for details.
- e. Please see the response to part (d), above.

Response of United States Postal Service Witness Degen
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TW/USPS-T12-5. Please describe how information on "basic function" and facility size (CAG) available on IOCS tallies was used in your new methodology for distributing clerk and mailhandler costs. Additionally, please respond to the following questions.

- a. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 within each MODS cost pool, did you make any use of the "basic function" data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.
- b. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 within each BMC cost pool, did you make any use of the "basic function" data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.
- c. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 for non-MODS, non-BMC facilities, did you make any use of the "basic function" data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.
- d. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 within each MODS cost pool, did you make any use of the facility size (CAG) data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.
- e. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 within each BMC cost pool, did you make any use of the facility size (CAG) data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.
- f. In distributing the costs associated with IOCS activity codes 5300-5750 and 6521-6523 for non-MODS, non-BMC facilities, did you make any use of the facility size (CAG) data recorded by IOCS clerks? If yes, please describe how you used this information. If no, please explain why you chose not to use it.

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TW/USPS-T12-5. Response:

“Basic function” is not used to distribute clerk and mailhandler costs for MODS and BMC facilities. The pool of volume variable costs for the non-MODS, non-BMC offices is distributed to basic function using the distribution of IOCS mail processing tally dollars, and distribution keys are formed by basic function, using the treatment of mixed-mail and not-handling-mail tallies described in the testimony. CAG information is not used, except to the extent that the tally dollar weights depend on the tally CAG.

- a. No. The basic function information was not used because the MODS cost pools provide a better and more detailed breakdown of mail processing at MODS facilities for distribution key formation. Please note that activity codes 53XX-54XX are distributing activity codes for the mixed item, mixed container, and not-handling mail steps of the distribution key formation process.
- b. No. The basic function information was not used because the BMC cost pools provide a better and more detailed breakdown of mail processing at BMCs for distribution key formation.

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- c. Yes. As explained above and in LR-H-146, non-MODS, non-BMC mail processing cost pools and distribution keys are based on basic function.
- d. Please see the explanation above. The reasons for not using CAG to form cost pools directly are the same as for basic function.
- e. Please see the explanation above.
- f. Please see the explanation above.

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TW/USPS-T12-6.

- a. Please describe the instructions to IOCS data collectors in FY96 for recording data on mixed mail items and containers and for application of the top piece rule. Please also provide a copy of those instructions and explain all differences between the instructions that applied in FY96 and those that applied in FY93 and were described in the R94-1 rate case (see, e.g. Docket R94-1, USPS-T-4 at 5 and LR-G-12).
- b. What were the costs associated with (1) counted mixed mail items; (2) uncounted mixed mail items; and (3) mixed mail containers under your new FY96 attribution methodology?
- c. Please describe how your treatment of tallies representing counted mixed mail items, uncounted mixed mail items and mixed mail containers differs from the treatment that was used in FY93 and described in the R94-1 rate case, as well as the rationale for making any changes. Additionally, please describe any difference between your new method and the method applied in the FY96 CRA and, if applicable, the rationale behind changes made.
- d. Are the costs associated with counted and uncounted mixed mail items and mixed mail containers included under the direct costs distributed to subclasses and special services in Table 6 of your testimony? If no, please specify which portion of the costs for each tally type is included under subclass and special service costs and which portion is included under mixed mail in Table 6.
- e. Is the distribution of uncounted mixed mail item tallies based on data for counted mixed mail items? If no, please describe how the distribution was done.
- f. Is the distribution of uncounted mixed mail items performed separately within each cost pool, based on counted mixed mail items from the same cost pool, or based on counted item data from all cost pools? Please explain.
- g. Is the distribution of uncounted mixed mail item tallies based on data for counted mixed mail items of the same item type only? If no, please describe how the distribution was done.

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- h. In LR-H-146, at page II-3, the last sub-step listed under Step 1 is:
"Construct piece shape/item type distribution factors for Step 2, based on direct tallies." Please explain which direct tallies were used for this purpose and provide a table, in spreadsheet form, showing the piece shape/item type distribution factors that were constructed. Additionally, please explain which of these factors were used to distribute uncounted mixed mail item tallies and which were used to distribute mixed mail container tallies.
- i. Please provide a table, in spreadsheet form, showing the attributed costs associated with counted mixed mail items, uncounted mixed mail items and mixed mail containers per item and container type and by cost pool.
- j. Please provide a table, in spreadsheet form, showing the attributed costs associated with counted mixed mail items, uncounted mixed mail items and mixed mail containers per item and container type and by mail subclass.
- k. At page II-3, LR-H-146 says:

"Distributing sets consist of records with a mail or special service activity code (F262 = 1000-4950, 53XX-54-XX, and 0010-0300 for specified situations) and distributed sets consist of those without."

Please explain how tallies with activity code 53XX-54XX are distributed to individual mail subclasses and whether costs corresponding to such tallies appear as "direct" or "mixed" costs in Table 6 of your testimony.

TW/USPS-T12-6. Response:

- a. The instructions for IOCS Questions 21 and 22, are contained in section 12 of LR-SSR-12, Docket No. MC96-3.
- b. Please consult LR-H-219, which will be filed shortly. Note that for this analysis, "uncounted mixed mail items" includes empty items, since

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these are treated identically. The analysis of "mixed mail containers" is of "identified" containers.

c. I am informed that the treatment of counted mixed-mail items is the same in the FY 1996 CRA as in the base year for the R94-1 rate case. The treatment of counted mixed-mail items in BY 1996 is similar to that used in FY 1996 in the sense that the counted item information is combined with identical mail and top piece rule items to form a distribution key for the uncounted mixed-mail item dollars. There are a number of significant changes introduced in the new methodology. These changes are described in my testimony, USPS-T-12, at 9-10, and in LR-H-146. The rationale for these changes is that item and container type, cost pool, and data container contents (where available) contain more and better information for the mixed-mail distribution than basic function, CAG, and the mixed-mail activity codes.

d. Tallies for counted items are divided into several records corresponding to each of the subclasses of mail observed in the counted item, and assigned the appropriate direct activity codes. These are treated as direct tallies for compilation of Table 6. Uncounted item and mixed-mail container tallies have mixed-mail activity codes and are thus included in

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the mixed-mail line of Table 6.

- e. Yes. Counted mixed-mail items and other direct item tallies are combined to form distribution keys for uncounted mixed-mail item tallies. Please see USPS-T-12 at 9 (lines 8-11).
- f. Yes. Please see USPS-T-12 at 9 (lines 10-13).
- g. Yes. Please see USPS-T-12 at 9 (lines 10-13).
- h. The direct tallies for the shape distribution factors are direct tallies handling single pieces of mail, by shape and cost pool. The direct tallies for the item type distribution factors are tallies for identical mail and top piece rule items, plus pro-rated tallies for counted mail items. The item type distribution factors are used to distribute both uncounted mixed-mail items and pro-rated tally costs of handling items observed in "identified" mixed-mail containers. The shape distribution factors are used to distribute the pro-rated tally costs of handling loose mail in "identified" mixed-mail containers. Please consult LR-H-219.

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- i. Please consult LR-H-219.
- j. Please consult LR-H-219.
- k. "Tallies with activity code 53XX-54XX" includes some identical mail, top piece rule, and counted mixed-mail items, and the portion of uncounted mixed-mail item tallies, mixed-mail container tallies, and not-handling tallies distributed to those activity codes in the distribution key formation process. These are redistributed to the subclasses of mail in the MOD4DIST program. Please see the answer to TW/USPS-T12-3, part c, for the direct activity codes associated with each subclass of mail. Also see the source code to program MOD4DIST, lines 373-425. In Table 6 of my testimony, these costs appear as "mixed" costs.

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TW/USPS-T12-7. Please provide a spreadsheet showing the following information in tabular form. For each cost pool, and for each "basic function", specify the "direct" costs attributed to each subclass and special service, consistent with the total "direct" costs for each subclass and special service in Table 6 of your testimony, as well as all costs summarized as "mixed" or "other" in Table 6 of your testimony, by IOCS activity code.

TW/USPS-T12-7. Response:

Please consult the spreadsheet tw-7.xls, filed in LR-H-219. Please note that the volume variable cost pools cannot be disaggregated by basic function using MODS data so this table is an artificial construct in the context of the new costing methodology. To obtain volume variable cost pools disaggregated by basic function, we used the total IOCS tally dollars by cost pool and basic function to distribute the volume variable costs from Table 4 of my testimony.

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TW/USPS-T12-8. The MODS cost pools listed in Table 4 of your testimony include LDC codes 41-44, 48-49 and 79. Please explain which types of operations these codes describe. In particular:

- a. LDC 41 is referred to as "Unit Distribution - Automated". What types of units are being distributed, with what kinds of automation and using what kinds of sortation schemes? Also please explain why this type of operation is specified separately from the other cost pools that denote *automated distribution* such as OCR, BCS, etc.
- b. LDC 42 is referred to as "Unit Distribution - Mechanized". What types of units are being distributed, with what kinds of mechanization and using what kinds of sortation schemes? Also please explain why this type of operation is specified separately from the other cost pools that denote *mechanized distribution* such as LSM, FSM, etc.
- c. LDC 44 is referred to as "Post Office Box Distribution". What items are distributed to boxes in this operation? Also, please state whether this *represents all box distribution in MODS offices, or whether distribution to boxes also occurs as part of other cost pools such as manual letters and manual flats.*
- d. Are these LDC functions all part of mail processing?
- e. Does each three-digit MODS number correspond to a unique LDC code?
- f. Are there ranges of one or more three-digit MODS numbers for every LDC code?
- g. Please provide a table that shows the relationship between all LDC codes and all three-digit MODS numbers used by the Postal Service.

TW/USPS-T12-8. Response:

Please see LR-H-146, I-32 to I-38. The definitions of LDCs are also contained in the MODS manual (M-32) and the updates thereto; please see LR-H-147. LDC codes 41-43 encompass distribution of mail to carrier route

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at stations, branches, and associate offices. LDC 41 also includes delivery point sequencing. LDC 44 covers distribution of mail to post office box sections or to the post office boxes in stations, branches, and associate offices. The LDC 48 cost pools include administrative work of Customer Services employees, work related to Express Mail and the provision of special services, some markup activities, and bulk mail acceptance in facilities without a specialized acceptance staff. LDC 49 encompasses non-supervisory work in Computerized Forwarding System (CFS) units. LDC 79 encompasses non-supervisory work in mailing requirements, bulk mail acceptance, presort verification, and other revenue protection activities.

- a. The term "unit" refers to the carrier unit in a station, branch, or associate office. The MODS codes associated with the LDC 41 cost pool are related to automated secondary distribution (i.e., distribution to carrier route) and tertiary distribution (delivery point sequencing, DPS). It is my understanding that this sortation is performed on the Carrier Sequence Barcode Sorter (CSBCS) and that the equipment is primarily used for DPS. See USPS-T-4 at 7 for a description of the CSBCS. The main reason to specify this pool separately from the BCS pool is to allow for differences in variability and the mail class distribution of delivery point barcoded mail being worked in the stations and branches, and barcoded

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mail worked in the plants.


- b. See (a) above for the meaning of the term "unit." LDC 42 is mechanized distribution of letters and flats to carrier route. The reason to separate this pool from the LSM and FSM pool are the same as those given in (a).
- c. LDC 44 includes distribution of letters, flats, IPPs, and parcel post to box sections and actual post office boxes in stations, branches, and associate offices. Other distribution-related cost pools such as manual letters, manual flats, BCS, and so on, include MODS codes for sortation to box section at plants.
- d. Yes. The borderline case is the LD48_Adm cost pool, but since this pool has a variability factor of zero, it does not enter into the distributed variable costs for the mail processing cost component.
- e. With respect to clerks and mailhandlers, each MODS code is associated with a single LDC. Some MODS codes may be assigned to different LDCs when the employee is a supervisor.

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- f. Yes, for each non-vacant mail processing LDC code there is a corresponding range of MODS codes.
- g. Please see Witness Bradley's Testimony, USPS-T-14, Exhibit 14A.

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.



Eric P. Koetting

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