

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS RALPH J. MODEN  
(OCA/USPS-T4-1-8)  
August 19, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

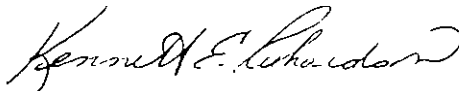
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T4-1. Please provide a list of all mechanized and automated mail processing equipment in use during FY 1996. This list should include equipment specifically referred to in your testimony (LSMs, MLOCR, Low Cost MLOCR, MLOCR-ISS, AFCS, AFCS-ISS, IPSS, DPBC-OSS, DBCS, etc.) as well as any mail processing equipment not specifically mentioned in your testimony.

OCA/USPS-T4-2. For each type of mechanized or automated mail processing equipment in use during FY 1996, please provide:

- a. The number currently installed by CAG of office.
- b. The number currently installed by type (MODS, Non-MODS, or BMC) of office.
- c. The number currently installed by CAG by type of office.

OCA/USPS-T4-3. Please provide a list of each type of mechanized or automated mail processing equipment in use for each year that the MODS system was operational.

OCA/USPS-T4-4. For each year that the MODS system was operational, please provide the following for each type of mail processing equipment listed in response to OCA/USPS-T4-3:

- a. The number installed by CAG of office.
- b. The number installed by type (MODS, Non-MODS, or BMC) of office.
- d. The number installed by CAG by type of office.

OCA/USPS-T4-5. Please provide a list of all mechanized and automated mail processing equipment planned for deployment by the end of FY 1999. This list should include equipment specifically referred to in your testimony (OCR for FSM 881s, HSFF on FSM 881s, BCR for FSM 1000s, etc.) as well as any mail processing equipment not specifically mentioned in your testimony.

OCA/USPS-T4-6. For each type of mechanized or automated mail processing equipment listed in response to OCA/USPS-T4-5, please provide:

- a. The planned deployment by CAG of office by year (as of the end of FY 1997, 1998, and 1999).
- b. The planned deployment by type (MODS, Non-MODS, or BMC) of office by year.
- c. The planned deployment by CAG by type of office by year.

OCA/USPS-T4-7. Please refer to the National Coordination Audit of Mail Volume Measurement and Reporting Systems included in library reference H-220. Page 8 of this document states, "Management's lack of confidence in daily MODS data diminished the usefulness of the MODS system as a management tool." Please provide all documents relating to the reliability of MODS data and that of any predecessors to the current MODS system.

OCA/USPS-T4-8. Your testimony states that "the equipment and mailflows [at smaller facilities not covered by MODS] are similar to those at facilities reporting to MODS, and

the factors accounting for volume variability would thus be much the same regardless of facility size.”(page 22, lines 20-23).

- a. Please confirm that the equipment and mailflows are not identical at MODS and Non-MODS facilities. Please provide all documents relating to comparisons of the use of mail processing equipment and mailflows by facility type (MODS, Non-MODS, BMC).
- b. Please confirm that the equipment and mailflows are not identical at facilities of different sizes. Please provide all documents relating to comparisons of the use of mail processing equipment and mailflows by facility size (i.e., CAG, employee complement, square footage, etc.).
- c. Please confirm that the factors accounting for volume variability are not identical for facilities of different types. Please provide all documents relating to comparisons of volume variability for mail processing equipment by facility type.
- d. Please confirm that the factors accounting for volume variability are not identical for facilities of different sizes. Please provide all documents relating to comparisons of volume variability for mail processing equipment by facility size.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script, appearing to read "Kenneth E. Richardson".

KENNETH E. RICHARDSON  
Attorney

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