

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

RECEIVED
AUG 29 4 49 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T24-48-58)

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T24-48-58, filed on August 14, 1997, and redirected from witness Lion. Interrogatories OCA/USPS-T24-53(c) and OCA/USPS-T24-56 were further redirected to witness Alexandrovich.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
August 29, 1997

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-48. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery routes during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract routes during each of the past five fiscal years.

RESPONSE:

- a-b. See the TOTAL lines in the Responses to OCA/USPS-T24-49.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-49. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery routes by CAG during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract routes by CAG during each of the past five fiscal years.

RESPONSE:

a.	<u>CAG</u>	<u>1992</u>	<u>1993</u>	<u>1994</u>	<u>1995</u>	<u>1996</u>
	A	--	48035	48629	--	XXXX
	B	--	22388	22277	--	XXXX
	C	--	40098	42211	--	XXXX
	D	--	15651	16447	--	XXXX
	E	--	16795	17403	--	XXXX
	F	--	7859	8153	--	XXXX
	G	--	4314	4375	--	XXXX
	H	--	1129	1174	--	XXXX
	J	--	131	143	--	XXXX
	K	--			--	XXXX
	L	--			--	XXXX
	TOTAL	157386	156400	60812	168812	167813

Generally speaking, counts of city carrier routes by CAG are not retained. Counts of routes by CAG for FY 1993 and FY 1994 were obtained from ORFEO files. The ORFEO file for FY 1992 is no longer available. With the implementation of MEPs in FY 1995, the ORFEO frame was no longer updated, so usable counts are not available for FY 1995. Programming problems have been encountered in trying to obtain counts by CAG from a different source for FY 1996. This response will be supplemented when that information becomes available, which is expected to happen within one week.

Aggregate counts routes for FY 1993 and FY 1994 may not agree with other sources of similar data due to different sources and when files were created, and also perhaps because of the inclusion or deletion of various small categories of route types.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

b.	<u>CAG</u>	<u>1992</u>	<u>1993</u>	<u>1994</u>	<u>1995</u>	<u>1996</u>
	A	1448	1510	1695	1644	1727
	B	1807	1857	2050	1889	2229
	C	5358	5528	6025	6011	6666
	D	3667	3783	4086	4385	4470
	E	7639	7852	8456	8373	8884
	F	6870	7014	7437	7715	7940
	G	7300	7430	7813	7796	8298
	H	5698	5742	6011	6276	6439
	J	4660	4686	4834	5032	5172
	K	3806	3792	3845	4001	4059
	L	58	56	48	51	42
	TOTAL	48311	49250	52300	53173	55926

The counts of routes shown above may differ slightly from counts shown in other sources. Differences may be due to the time of source file creation and the inclusion or deletion of various small categories of route types. These figures may or may not include HCR routes. Comprehensive Statements on Postal Operations indicate approximate counts of HCR delivery routes for the fiscal years 1992 through 1996, respectively, as follows: 5,684; 5,843; 5,740; 5,600; and 6,200.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-50. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery carriers during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract carriers during each of the past five fiscal years.

RESPONSE:

a-b. No counts of highway contract carriers, as distinct from highway contract routes, have been located. The counts of city and delivery carriers the 1996 Postal Service Annual Report appear below.

	<u>1996</u>	<u>1995</u>	<u>1994</u>	<u>1993</u>	<u>1992</u>
City Carriers	238,370	239,877	229,138	211,893	223,088
Rural Carriers	48,340	46,113	45,049	43,694	43,283

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-51. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery carriers by CAG during each of the past five fiscal years.
- b. Please provide the number of rural delivery carriers by CAG during each of the past five fiscal years.

RESPONSE:

The only data available are from the last three years. Attachment 1 to the Response to this interrogatory provides counts of city and rural carriers by CAG for accounting period 12 in 1997, 1996 and 1995, as reported by the Minneapolis Information Services Center. The "D/A" codes used as column headings correspond as follows to respective types of carriers.

<u>D/A Code</u>	<u>Description</u>
13-4	Full time city carriers
33-4	Part time regular city carriers
43-4	Part time flexible city carriers
63-4	Casual city carriers
71-1	Full time rural carriers
72-0	Substitute rural carriers on vacant routes
73-0	Substitute rural carriers
75-0	Relief/replacement rural carriers
77-0	Auxiliary rural carriers
79-0	Casual rural carriers

AP 12-97 COUNT SELECTED D/A'S BY CAG

CAG	D/A 13-4	D/A 33-4	D/A 43-4	D/A 63-4	D/A 71-0	D/A 72-0	D/A 73-0	D/A 75-0	D/A 77-0	D/A 79-0
A	66,027	597	6,969	2,018	1,628		2	18	1	183
B	31,409	220	3,393	969	2,009		3	34	1	235
C	51,787	156	6,996	1,456	5,868		10	72	3	703
D	19,495	43	3,382	554	3,988		5	64	3	436
E	20,629	44	4,396	591	8,189	1	20	107	9	992
F	8,252	10	2,800	271	7,144		21	131	7	924
G	3,383	3	2,060	150	7,398		37	163	15	1,068
H	720		683	35	5,564		39	138	24	896
J	64		109	6	4,416		40	136	26	728
K	7		7		3,574	1	63	128	14	405
L					35		1	4		2

Attachment 2, p. 1

MINNEAP S ISSC

AP 12-97 COUNT SELECTED D/A'S BY CAG

CAG	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A
13-4	33-4	43-4	63-4	71-0	72-0	73-0	75-0	77-0	79-0			
201,773	1,073	30,795	6,050	49,813	2	241	995	103	6,572			

AP 12-96 COUNT SELECTED D/A'S BY CAG

CAG	D/A 13-4	D/A 33-4	D/A 43-4	D/A 63-4	D/A 71-0	D/A 72-0	D/A 73-0	D/A 75-0	D/A 77-0	D/A 79-0
A	66,119	526	7,260	1,559	1,458		2	24	1	153
B	32,117	205	3,467	659	1,902		4	39		198
C	54,975	124	7,448	1,189	5,664		14	93	2	662
D	19,688	27	3,450	402	3,867		7	76	4	423
E	20,410	26	4,435	495	7,675		24	123	12	867
F	8,312	11	2,824	239	6,917		27	146	8	803
G	3,475		2,133	132	7,171		49	190	19	913
H	733		710	36	5,495		52	179	28	789
J	72		116	10	4,412		61	154	27	640
K	1		5		3,630		82	164	18	328
L					38		1	3		2

Attachment 1, p. 3

AP 12-96 COUNT SELECTED D/A'S BY CAG

CAG	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A
13-4	33-4	43-4	63-4	71-0	72-0	73-0	75-0	77-0	79-0			
205,902	919	31,848	4,721	48,229	323	1,191	119	5,778				

Attachment 2, p-4

AP 12-95 COUNT SELECTED D/A'S BY CAG

CAG	D/A 13-4	D/A 33-4	D/A 43-4	D/A 63-4	D/A 71-0	D/A 72-0	D/A 73-0	D/A 75-0	D/A 77-0	D/A 79-0
A	66,512	385	7,338	1,468	1,368		2	68	2	148
B	30,177	172	3,335	695	1,621		3	74	1	158
C	55,853	107	7,754	1,101	5,121		18	232	3	571
D	20,300	24	3,722	381	3,772		9	195	6	427
E	20,801	19	4,700	484	7,266		31	380	13	741
F	8,347	6	2,870	207	6,724		33	365	16	737
G	3,555		2,172	131	6,780		56	378	25	812
H	728		711	40	5,379	2	72	320	42	712
J	74		123	6	4,384		73	251	33	536
K	2		7		3,647		92	243	21	259
L					47		3	6		1

Attachment 1, p. 5

AP 12-95 COUNT SELECTED D/A'S BY CAG

CAG	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A	D/A
13-4	33-4	43-4	63-4	71-0	72-0	73-0	75-0	77-0	79-0		
206,349	713	32,732	4,513	46,109	2	392	2,512	162	5,102		

Attachment 1, p 6

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-52. Please refer to your testimony at page 1, lines 17-22.

- a. Please define city delivery.
- b. Please define Rural delivery.
- c. Please describe the features that distinguish a city delivery route from a rural delivery route and a rural delivery route from a city delivery route.

RESPONSE:

- a. "City delivery" refers to services provided by city letter carriers, on city letter routes.
- b. "Rural delivery" refers to services provided by rural letter carrier, on rural routes.
- c. City and rural delivery differ primarily on the basis of craft jurisdiction and method of compensation. City letter carriers are represented by the National Association of Letter Carriers. City letter route assignments are normally structured to required 8 hours of work for full time regular employees, less for auxiliary routes carried by part-time flexible or casual employees. Employees are compensated at an hourly rate for actual hours worked, and overtime is payable for work in excess of 8 hours per day or 40 hours per week.

Rural carriers are represented by the National Rural Letter Carriers' Association. Regular routes are normally structured to require between 39 and 58 hours of work over a six day week, based on specific time standards applied to measured or "evaluated" workload elements like miles traveled, boxes served and mailpieces, by type. Regular carriers may work each of the six days ("H" route status), or receive one day off per pay period or week to limit the total workhours required (larger "J" or "K" routes, respectively). Auxiliary routes normally

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

evaluate less than 39:00 hours per week. With some limited exceptions, rural carriers receive salary reflecting the average measured workload or "evaluated" hours, even though their actual workloads and workhours will vary on a daily basis. *Mileage or "M" routes form an exception to this compensation structure.* M routes have an evaluated value, but compensation for their assigned carriers is grandfathered based on their required miles of service. As these routes are vacated, M status is eliminated and carriers are compensated in accordance with the evaluated salary schedule, as appropriate. There are only 70 M routes remaining at this time.

The "L" designator may be applied to all rural route types (A, H, J, K and M). It denotes a box density of 12.0 per mile or greater as a result of a mail count, for that particular route, and therefore a different time standard applied to regular-type mailboxes.

As indicated above, the term "rural delivery" is a reflection of a work structure and compensation system, and not a limitation to a particular customer base or geographic delivery area. *Rural routes historically existed in "rural" areas.* However, rural delivery service meets customer needs in an efficient and cost effective manner and is normally continued as areas grow and develop. Consequently, rural delivery is commonplace in all types of communities and delivery situations, including suburban, high-density, high-rise, and corporate office settings.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

Conversely, city routes rarely occur in sparsely populated areas. Rural carriers are often characterized as a "post office on wheels" because they maintain stamp stock for sale to customers at their boxes. They also provide a variety of retail services, including the sale of money orders, acceptance of parcels for weighing and rating, and acceptance of items for registry. While customers of city routes can purchase stamps by mail or phone, city carriers do not provide the same degree of retail services as rural carriers.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-53. Please refer to your testimony at page 1, lines 17-22.

- a. Please define highway contract delivery.
- b. Please confirm that highway contract delivery is a form of rural carrier delivery. If you do not confirm, please explain.
- c. Please confirm that the costs of highway contract delivery are contained in Cost Segment 10. If you do not confirm, please explain.

RESPONSE:

- a-b. Rural carriers are postal employees. Rural routes are evaluated, compensated and administered in accordance with a labor agreement, handbooks and manual references specific to rural delivery. Highway contract delivery is not a form of rural carrier delivery. Highway contract carriers are independent contractors rather than postal employees, whose workloads and routes are documented and compensated through an entirely different channel: contracts.
- c. Redirected to witness Alexandrovich.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-54. Please refer to your testimony at page 1, lines 17-22.

- a. Please explain how the Postal Service determines whether postal customers receive city or rural delivery service. Please identify and explain all factors in making this determination.
- b. Please identify the final decision authority for determining whether postal customers receive city or rural delivery service.
- c. Please provide, and file as a library reference, any guidelines, manuals or other documents that assist in the determination whether postal customers shall receive city or rural delivery service.

RESPONSE:

- a. Generally, the Postal Service tries to meet customer needs in the most efficient manner possible through its coherent and cohesive service structure. Many factors can be involved in determining whether customers receive city or rural delivery service, and decisions vary based on their relative significance in a particular situation. Unfortunately, it is impossible to define every possible consideration and outcome, but factors include: the total number of customers requiring service in the immediate, near and long terms; any plans for further development; the location of the area to be served in relation to existing ZIP Code and municipal boundaries; the location in relation to existing city or rural service; accessibility of the location from existing lines of carrier travel; any ability of existing assignments to absorb the workload; the availability and suitability of support equipment; expected mail type, volume characteristics and customer needs; the cost of providing service; and impacts on scheduling and staffing.
- b. Establishment of city delivery service is considered when the essential requirements of POM (Issue 7) § 641.2 a. - h. have been met. Establishment of

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

city delivery service must be approved by District Managers, Customer Service and Sales or their designees, POM §§ 641.2, 641.3. Extension of city delivery service in accordance with POM § 642.2 can be approved by local postmasters. However, this does not preclude Districts from requiring postmasters to submit requests for extensions of city delivery service for review so as to ensure consistency with established post office boundaries, sort plans, municipal identity concerns, growth management plans, or similar factors. Any conversion of existing city delivery service to rural delivery service must be approved by the district manager, POM § 644.1. Establishment or extension of rural delivery service is considered and approved by the district manager or designee, POM §§ 652.421 and 653.7.

Any conversion of existing rural delivery service must be approved by the district manager, except when cost is the basis of conversion, in which case an Area review is required, POM §§ 654.1, 654.21(d).

- c. Responsive material is provided in library reference H-240.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-55. Please refer to your testimony at page 1, lines 17-22.

- a. Please explain how the Postal Service determines where to locate new post offices to serve postal customers. Please identify and explain all factors in making this determination.
- b. Please explain how the Postal Service determines whether to expand an existing post office, or build a new post office, to service postal customers.
 - (i) Please identify and explain all factors in making this determination.
 - (ii) What role do mail volume and revenue play in determining whether to expand an existing post office.
- c. Please identify the final decision authority for determining whether to expand existing post offices, or build new post offices, to serve postal customers.
- d. Please provide, and file as a library reference, any guidelines, manuals or other documents that assist the final decision authority in determining whether to expand existing post offices, or build new post offices, to serve postal customers.

RESPONSE:

- a. There are a number of postal facility types or functions but the two most common are Customer Service Facilities (CSF), which are retail centers, and Processing & Distribution Centers (P&D) that are major mail sorting facilities.

All are site acquisition projects, whether owned or leased, and begin with a Request for Services (RFS) from Operations to Facilities for a new or expanded facility to meet a current or future operational need. The request is the culmination of a study showing that a particular facility is no longer adequate or is based upon a lease expiration when the owner refuses to renew it. The RFS is a space requirements package that sets certain parameters such as the preferred area, the ideal site, and building size.

The preferred area is the delivery area served by the facility. For CSF facilities,

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

the new building is ideally located in the center of this area to equalize driving distances for carrier routes. From a practical standpoint, the center may be in the middle of a residential subdivision, so the most common placement would be in a commercial zone, or business hub, closest to the center of the delivery area. New site, building, and parking requirements arise from population growth; new or expanded routes necessary to meet local community needs; new automation equipment that will not fit in the present space; or environmental, fire and safety codes, or handicap accessibility issues.

P&D Centers are generally located in industrial areas and along major transportation routes such as interstate highways or major roads since much of the operation is served by heavy truck traffic.

Another type of postal building is the Air Mail Facility which is located at airports. Also, a Carrier Annex is generally located away from the downtown business district, preferably in industrial areas. Finally, there are stations and branches which are the extensions of Main Post Offices.

In choosing a site within a defined area, the Postal Service will look for locations that provide the best overall "package", looking at location, access, topography, subsurface conditions, improvement costs, zoning, environmental, expressed community wishes, as well as the negotiated acquisition or lease costs. A low cost site is generally no bargain if, for example, it is located in a wetlands area or

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

is far removed from the business district or major transportation routes.

Additionally, a less favorable location may result in higher transportation or carrier costs throughout the life of the facility. In many cases, operational and customer benefits outweigh all other factors. The Postal Service strives to obtain those locations that provide the best overall value for the dollar and allow it to meet its operational and/or customer service needs.

- b. Although the RFS identifies the ideal site size and building space requirements, first consideration in meeting new space requirements is through expansion of the existing facility; including acquiring additional adjacent land as necessary to meet site and parking needs. If it is physically impossible to expand or acquire sufficient land around the building, consideration is next given to advertising for an existing building and/or land to construct a new facility, preferably in close proximity to the present office but always within the identified preferred area.

Factors considered when expanding include acquisition cost of adjacent property, facility and engineering costs, and expectations of operational requirements verses costs to acquire and construct a new facility.

Mail volume is a factor, but only as it relates to area population growth or the need and ability to install automated equipment in the existing facility. Revenue generated at a facility is not a factor in the decision to expand or relocate.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

- c. Based on the idealized site and building size in the RFS, Facilities will recommend to the appropriate Operational office that the existing facility can be economically expanded to meet new space requirements. If approved, the project is converted to an expansion project.

For new construction or Alternate Quarters leased projects costing less than \$2,500,000, site locations are approved by a Site Review Committee consisting of the following postal members: District Manager (CSF)/Plant Manager (P&D), or designee Manager; Facilities Service Office (FSO)/Major Facilities Office(MFO), or designee Postmaster.

If the project is planned as postal-owned or lease/alternate quarters and the total project costs exceed \$2,500,000, but less than \$5,000,000, the Vice President, Area Operations, or designee, is added as a voting member of the Committee.

If the facility project costs exceeds \$5,000,000, voting members of the Site Review Committee consists of: Vice President, Area Operations, or designee; Manager, Planning & Approval (Headquarters), or designee; Manager, Human Resource (Area Office), or designee; Manager, FSO/MFO, or designee; District Manager/Plant Manager, or designee.

New construction projects exceeding \$5,000,000 but less than \$7,500,000 are approved by Postal Service's Chief Operating Officer.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

Projects exceeding \$7,500,000 but less than \$10,000,000 are approved by the Postmaster General.

All projects exceeding \$10,000,000 are approved by the Board of Governors.

- d. Materials responsive to this interrogatory are filed as library reference H-241. This library reference will be supplemented with a copy of RE-1, *Realty Acquisition and Management*, when it arrives in the next week. (A copy had to be ordered.)

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-56.

This interrogatory was redirected to witness Alexandrovich.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-57. Please refer to your testimony at page 1, lines 17-22.

- a. Please confirm that there are three types of "evaluated" routes for rural carriers: H Routes, J Routes, and K Routes. If you do not confirm, please explain.
- b. Please confirm that there are two types of "other" routes for rural carriers: Mileage (M) Routes, and Auxiliary (A) Routes. If you do not confirm, please explain.
- c. Please confirm that all "evaluated" routes and the auxiliary routes are designated as "L" routes and "Non-L" routes depending on rural box density.
- d. Please confirm that "L" routes have 12 or more boxes per mile and "Non-L" routes have fewer than 12 boxes per mile. If you do not confirm, please explain.
- e. Please confirm that "L" routes can be found in every CAG. If you do not confirm, please explain.
- f. Please confirm that "Non-L" routes can be found in every CAG. If you do not confirm, please explain.
- g. Please provide the number of "evaluated" and auxiliary routes designated as "L" routes and "Non-L" routes, and the percent of "L" routes and "Non-L" routes to the total number of routes, for each CAG during each of the past five fiscal years.

RESPONSE:

a-d. See the Response to OCA/USPS-T24-52.

e-f. Generally, any type of rural route routinely occurs in post offices in CAG A through CAG K. It is conceivable, but much less likely, that any type of rural route could also occur in a CAG L office, since the workload represented by a rural route is normally associated with sufficient revenues, workloads, and hours of operation to push a CAG L office up to CAG K or greater.

g. In the tables which follow there are two lines of data for each CAG and route category combination. The top line shows the number of routes, and the bottom line, its percent of total routes.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

NOTE: Counts of routes shown may differ slightly from counts shown in previously supplied documents. Differences may be due to the time of source file creation and the inclusion or deletion of various small categories of route types.

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

	FY 96		OTHER
	<u>H. J. K. & A. ROUTES</u>		
	<u>L</u>	<u>NON-L</u>	
A	1357	370	0
	2.43	0.66	0.00
B	1482	747	0
	2.65	1.34	0.00
C	4187	2479	0
	7.49	4.43	0.00
D	2694	1776	0
	4.82	3.18	0.00
E	4857	4027	0
	8.68	7.20	0.00
F	3532	4405	3
	6.32	7.88	0.01
G	3082	5210	6
	5.51	9.32	0.01
H	1456	4971	12
	2.60	8.89	0.02
J	492	4659	21
	0.88	8.33	0.04
K	90	3923	46
	0.16	7.01	0.08
L	0	40	2
	0.00	0.07	0.00
SUM	23229	32607	90
	41.54	58.30	0.16

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

	FY 95		<u>OTHER</u>
	<u>H, J, K, & A ROUTES</u>		
	<u>L</u>	<u>NON-L</u>	
A	1282	362	0
	2.41	0.68	0.00
B	1275	614	0
	2.40	1.15	0.00
C	3774	2236	1
	7.10	4.21	0.00
D	2666	1719	0
	5.01	3.23	0.00
E	4439	3934	0
	8.35	7.40	0.00
F	3465	4248	2
	6.52	7.99	0.00
G	2866	4922	8
	5.39	9.26	0.02
H	1368	4894	14
	2.57	9.20	0.03
J	467	4536	29
	0.88	8.53	0.05
K	84	3855	62
	0.16	7.25	0.12
L	0	48	3
	0.00	0.09	0.01
SUM	21686	31368	119
	40.78	58.99	0.22

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

	FY 94		<u>OTHER</u>
	<u>H, J, K, & A ROUTES</u>		
	<u>L</u>	<u>NON-L</u>	
A	1337 2.56	358 0.68	0 0.00
B	1404 2.68	646 1.24	0 0.00
C	3841 7.34	2183 4.17	1 0.00
D	2494 4.77	1592 3.04	0 0.00
E	4669 8.93	3787 7.24	0 0.00
F	3230 6.18	4204 8.04	3 0.01
G	2883 5.51	4923 9.41	7 0.01
H	1251 2.39	4742 9.07	18 0.03
J	404 0.77	4400 8.41	30 0.06
K	69 0.13	3710 7.09	66 0.13
L	0 0.00	44 0.08	4 0.01
TOTAL	21582 41.27	30589 58.49	129 0.25

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

FY 93			
	<u>H, J, K, & A ROUTES</u>		<u>OTHER</u>
	<u>L</u>	<u>NON-L</u>	
A	1147 2.33	363 0.74	0 0.00
B	1202 2.44	655 1.33	0 0.00
C	3391 6.89	2136 4.34	1 0.00
D	2204 4.48	1579 3.21	0 0.00
E	4112 8.35	3740 7.59	0 0.00
F	2841 5.77	4168 8.46	5 0.01
G	2560 5.20	4859 9.87	11 0.02
H	1047 2.13	4658 9.46	37 0.08
J	359 0.73	4285 8.70	42 0.09
K	57 0.12	3653 7.42	82 0.17
L	1 0.00	50 0.10	5 0.01
TOTAL	18921 38.42	30146 61.21	183 0.37

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

	FY 92		<u>OTHER</u>
	<u>H. J. K. & A ROUTES</u>		
	<u>L</u>	<u>NON-L</u>	
A	1098	350	0
	2.27	0.72	0.00
B	1149	658	0
	2.38	1.36	0.00
C	3254	2103	1
	6.74	4.35	0.00
D	2123	1544	0
	4.39	3.20	0.00
E	3964	3675	0
	8.21	7.61	0.00
F	2742	4122	6
	5.68	8.53	0.01
G	2470	4817	13
	5.11	9.97	0.03
H	991	4661	46
	2.05	9.65	0.10
J	342	4268	50
	0.71	8.83	0.10
K	60	3641	105
	0.12	7.54	0.22
L	1	52	5
	0.00	0.11	0.01
TOTAL	18194	29891	226
	37.66	61.87	0.47

RESPONSES OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS LION

OCA/USPS-T24-58. Please refer to your testimony at page 1, lines 17-22.

- a. Please confirm that the number of K routes has increased as a percent of total rural routes, while H routes have decreased as a percent of the total, during each of the past five fiscal years. If you do not confirm, please explain.
- b. Please explain the reason for, and the significance of, the increase (if any) in the number of K routes as a percent of total rural routes.
- c. Also, please explain the reason for, and the significance of, the decrease (if any) in the number of H routes as a percent of total rural routes.

RESPONSE:

- a. Substantially confirmed. While there has been an increase, only four of the five previous years have actually exhibited increases over the previous year.
- b-c. The recent changes in the balance of route types reflect preparation for a more fully automated mail stream. Without this type of preparation, the Postal Service would be more likely to end up with a plethora of underburdened routes and/or excess employees.

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 1.2 of the Rules of Practice.

K. N. Hollies
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
August 29, 1997