

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T4-1, 3-8(A) & (B))
AND MOTION FOR EXTENSION OF TIME TO REPLY TO
INTERROGATORY OCA/USPS-T4-2

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-1, 3-8(a) & (b), filed on August 19, 1997. Interrogatories OCA/USPS-T4-8(c) & (d) were redirected to witness Bradley. Each interrogatory is stated verbatim and is followed by the response.

The Postal Service also requests three additional days to provide a response to interrogatory OCA/USPS-T4-2. The personnel needed to determine whether this information is available and to produce it have not been available to do so until this week. The Postal Service will endeavor to provide an answer as soon as possible.

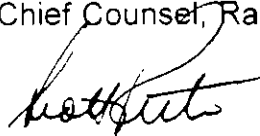
Counsel for the OCA indicated to the undersigned counsel that the OCA would not object to a short extension.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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Washington, D.C. 20260-1137
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September 2, 1997

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.

Response:

Below is a listing of all mechanized and automated mail processing equipment in use during FY 1996. Some of the items that you referenced in your question are actually modifications to existing pieces of equipment and are not stand-alone pieces. I have listed those types of modifications under the appropriate piece of equipment.

Letter Distribution

1. Multiline Optical Character Reader (MLOCR)
 - Co-directory
 - Gray scale camera
 - Hand Written Address Interpretation (HWAI)
2. Single Line Optical Character Reader (SLOCR)
3. Mail Processing Barcode Sorter (MPBCS)
 - Wide Area Barcode Reader (WABCR)
4. Delivery Barcode Sorter (DBCS)
 - Wide Area Barcode Reader (WABCR)
5. Carrier Sequence Barcode Sorter (CSBCS)
 - Wide Area Barcode Reader (WABCR)
6. Remote Bar Coding System (RBCS)
 - Image Processing Sub System (IPSS)

- AFCS-ISS (Input Sub System modification)
- MLOCR-ISS (Input Sub System modification)
- MPBCS-OSS (Output Sub System modification)
- DBCS-OSS (Output Sub System modification)
- Letter Mail Labeling Machine (LMLM)

7. Multi-Position Letter Sorting Machine (MPLSM)

- Expanded ZIP II Retrofit (EZR II)

Flat Distribution

1. Multi-Position Flats Sorting Machine (MPFSM) 881
 - Flat Mail Barcode Reader (FMBCR)
2. Multi-Position Flats Sorting Machine (MPFSM) 1000

Ccanceling Operations

1. Dual Pass Rough Cull System (DPRCS)
2. Mark II Facer Cancellor/Edger Feeder
3. Advanced Facer Cancellor System (AFCS)
4. Model 15 Flats Cancellor

Miscellaneous Processing Equipment

1. Computerized Forwarding System II (CFS II)
2. Small Parcel and Bundle Sorter (SPBS)

3. BMC Parcel Sorter

- Package Bar Code Sorting (PBCS) System

4. BMC Sack Sorter

- Sack Bar Code Label Scanner System

5. Linear Integrated Package Sorter (LIPS)

6. Integrated Mail Handling System (IMHS)

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.

Response:

This information is not available.

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.

Response:

This information is not available.

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.

Response:

Below is a list of planned deployments for FY 1998 through FY 1999.

Letter Distribution

1. Mail Cartridge Systems
2. Postal ID Code Readers
3. RCR/HW Mod Kits
4. DBCS/OCRs MOD Kits (Low Cost OCR)
5. DBCS/OSS MOD Kits
6. MMC Stacker MOD Kits
7. AFCS/ISS

Flat Distribution

1. Flat Mail OCR (FMOCR) for FSM 881s
2. Flat Mail WABCR for FSM 1000
3. Additional FSM 1000s
4. New Design Flat Sorting Machines

Canceling Operations

Automatic Facer Cancellers

Miscellaneous Processing Equipment

1. WABCR for CFS work stations
2. Upgraded computer systems for CFS sites
3. Mechanized work stations for CFS sites
4. Material Handling Robots
5. Tray Management Systems (TMS)
6. Small Parcel and Bundle Sorters (SPBS)
7. SPBS Feed Systems

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.

Response:

Many of our deployment schedules have not been finalized, so I am unable to provide you with all of the information specified in your request. However, where available, a listing of various deployment schedules by equipment by site is being filed as Library Reference H-244. Additionally, the reference also contains a list of processing facilities that includes the MODS code and CAG.

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.

Response:

The only other relevant document that I am aware of is the National Coordination Audit on Allied Workhours provided to the OCA in LR-H-236.

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.

Response:

- a. Confirmed. Equipment and mailflows are not "identical" among MODS facilities or between MODS and Non-MODS facilities. I am not aware of any documents relating to comparisons of the use of mail processing equipment and mailflows by facility type (MODS, Non-MODS, BMC).
- b. Confirmed. Equipment and mail flows are not likely to be "identical" even among facilities of the same size. I am not aware of any documents relating to comparisons of the use of mail processing equipment and mailflows by facility size (e.g. CAG, employee complement)
- c. Redirected to witness Bradley

d. Redirected to witness Bradley

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DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/2/97

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.



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 2, 1997