

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 DEGEN TO INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA  
(MPA/USPS-T12-1-7)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of Magazine Publishers of America: MPA/USPS-T12-1-7, filed on August 21, 1997.

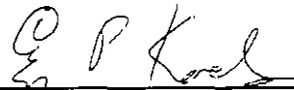
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

MPA/USPS-T12-1. Please refer to LR-H-1, Appendix C and E and LR-H-219, spreadsheet TW-3e.

- a. Please produce a description of how you distributed mixed mail codes to direct mail codes in a format similar to Appendix C of LR-H-1.
- b. Please list the distribution keys for all mixed mail codes in a format similar to Appendix E of LR-H-1.
- c. Please provide a description of how you distributed Other codes to direct mail codes in a format similar to Appendix C of LR-H-1.
- d. Please list the distribution keys for all Other codes in a format similar to Appendix E of LR-H-1.

MPA/USPS-T12-1 Response.

- a. *The mixed-mail codes in TW-3e do not directly correspond to the mixed-mail categories applied in the distribution key formation methodology described in my testimony, USPS-T-12, and in LR-H-146. In the new methodology, a "mixed-mail tally" is any tally where the employee was handling an "item" or "container" of mail and a direct activity code was not assigned. See USPS-T-12 at pp. 9-10 and LR-H-146 at II-7. Notwithstanding the difference in how tallies are classified, costs associated with both mixed-mail and not-handling-mail tallies are distributed to direct costs in essentially the same way as described in Appendix C of LR-H-1. The main difference is that the distribution takes place by cost pool instead of basic function for the MODS and BMC cost pools. In some cases, the distribution procedure is similar to that described in LR-H-1 for the "other" basic function in that the distribution is over several cost pools. Please see LR-H-146, part II, for details.*

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

- b. Please see Attachment 1 to this response. The attachment summarizes information contained in the program descriptions in LR-H-146, part II. As described in USPS-T-12 and LR-H-146, the mixed item and mixed container distribution steps do not distribute mixed-mail activity codes to a pre-specified set of direct-mail activity codes as in Appendix E of LR-H-1, but rather distribute the mixed-mail costs for a given item or container type on direct mail costs associated with the same item or container type. The distribution keys for the class-specific mixed-mail codes (e.g., activity code 5301) are similar to Appendix E of LR-H-1.
- c. Please see the response to part a.
- d. In general, the not-handling-mail tally costs are totaled by cost pool and distributed by cost pool. The requested information may be found in LR-H-146 at II-11. See LR-H-146 at II-15 and II-20 for discussion of differences in treatment for the BMC and non-MODS office groups.

**Specific Mail Codes Related to Mixed-Mail Codes**

1. Mixed items and containers

For discussion, details, and exceptions see USPS-T-12 at 9, and LR-H-146, part II.

Mixed-mail codes	Related activity codes	Tallies used for distribution
<p>“Uncounted” mixed items: F9214 = ‘A’-‘P’ and no direct activity code (including class-specific codes)</p>	<p>1000-4950 53XX-54XX selected 0010-0300 tallies (see LR-H-146 at II-7)</p>	<p>Direct tallies for same item type and cost pool</p>
<p>“Identified” mixed containers: F9219 = ‘A’-‘J’, no direct activity code (including class-specific codes), positive sum of F9901-F9919, F9420, F9421</p>	<p>1000-4950 53XX-54XX selected 0010-0300 tallies (see LR-H-146 at II-7)</p>	<p>Direct tallies in same cost pool for shapes and/or item types identified in container</p>
<p>“Unidentified” mixed containers: F9219 = ‘A’-‘J’, no direct activity code (including class-specific codes), sum of F9901-F9919, F9420, F9421 less than or equal to zero or error</p>	<p>1000-4950 53XX-54XX selected 0010-0300 tallies (see LR-H-146 at II-7)</p>	<p>Direct and “filled” identified container tallies for same container type and cost pool</p>

Attachment 1 - MPA/USPS-T12-1

2. Class-specific mixed-mail codes

Costs associated with the following activity codes are redistributed in programs MOD4DIST, BMC4, NONMOD4, LR-H-146.

Mixed-mail codes	Related activity codes
5301	10XX, 20XX, 30XX, 40XX
5302	Assigned directly to Priority
5303	Assigned directly to Express
5331	12XX, 22XX, 32XX, 42XX
5340, 5341	13XX, 23XX, 33XX, 43XX
5345	24XX, 34XX, 44XX
5460, 5461	Assigned directly to International

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

MPA/USPS-T12-2 Please refer to LR-H-219, Spreadsheet TW-3e.

- a. Please confirm that only 0.03 percent of BMC costs are for code 6521.
- b. Please confirm that all BMC costs for code 6521 are for platform operations. If confirmed, please explain why there are no 6521 costs for outgoing, incoming, and transit basic functions.
- c. Please confirm that only 1.99 percent of non-MODS costs are for code 6521.
- d. Please confirm that all non-MODS costs for code 6521 are for the Other basic function. If confirmed, please explain why there are no 6521 costs for outgoing, incoming and transit basic functions.
- e. Please confirm that 15.04 percent of all MODS costs are for code 6521.
- f. In spreadsheet TW-3e, have you already distributed costs for code 6521 at BMCs and non-MODS facilities to direct mail codes? If so, Please reproduce spreadsheets LR-H-219, TW-3e and TW-7 with costs for code 6521 not distributed to direct mail codes.
- g. Please explain why a clerk or mailhandler in a specific operation would require more breaks and personal needs time than if he were in any other operation. Based upon this explanation, please list the operations which require an above average amount of breaks and personal needs time and those which require a below average amount of breaks and personal needs time.
- h. Please individually provide grand total 6521, 6522, and 6523 costs combined for all facilities and operations for each of the last ten years and provide these costs as a percentage of total mail processing cost.
- i. Please confirm that IOCS identifies \$278 thousand of costs for activity codes 5120 and 6120, which relate to Window Service – US Passport Applications.
  - (i) Please confirm that the Postal Service is reimbursed for performing these activities.
  - (ii) If confirmed, why are costs for these Passport Application-related activities distributed to classes of mail?

MPA/USPS-T12-2 Response.

- a. Not confirmed. The costs associated with activity code 6521 should be collected in the 'Z BREAKS' BMC pool according to program BMC1. The 'Z BREAKS' costs are redistributed to the other BMC cost pools in the

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

cost pool amounts and variable costs listed in Table 4 of my testimony, USPS-T-12. According to the "DOLLAR" column of the table on page VI-6 of LR-H-146, 'Z BREAKS' pool costs total \$114,665,920 in FY 1996, or 18.6% of BMC mail processing costs before the application of variability factors.

- b. Not confirmed. The 6521 entry under the Platform pool in TW-3e is erroneous. The redistribution of breaks costs to the BMC cost pools in Table 4 of USPS-T-12 takes into account the fact that employees take breaks from all operations.
- c. Not confirmed. Breaks costs constitute 8.98% of IOCS mail processing tally costs for the non-MODS office group. The balance of activity code 6521 costs for the office group have been redistributed in TW-3e.
- d. Confirmed. I believe this coding occurs because an employee on break cannot generally be identified as working an outgoing, incoming, or transit operation.
- e. Confirmed. As explained in my response to Time Warner, the 15.04% of MODS costs associated with activity code 6521 are the volume variable costs that would have been distributed to activity code 6521 if it were a *distributing* activity code.

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

- f. The 6521 costs have been redistributed for the BMC and non-MODS office cost pools, but not for the MODS cost pools. Attachment 1 to this response contains the requested information.
- g. I am informed that break time percentages tend to be higher in operations which involve relatively more container handling, since the work is physically strenuous and dirtier, requiring more washup time. Based on this, I would expect costs for IOCS break costs as a fraction of total tally costs to be higher for cost pools such as the MODS LDC 17 allied operation pools. I have not conducted a formal analysis, but it appears that break time is slightly higher in these pools relative to the MODS cost pools associated with distribution activities.
- h. Grand total costs for the breaks/personal needs, clocking in and out, and moving empty equipment operations from 1969-1993 are reported in the Opinion and Recommended Decision, Docket No. R94-1, at III-9. Attachment 2 to this response contains the requested IOCS tally costs for 1994, 1995 and 1996 using the old (IOCS operation based) definition of mail processing for comparison purposes. Please note that activity code 6522 costs fall under administrative, not mail processing, operation codes in the old methodology.
- i. Confirmed that \$278,000 in volume-variable costs are distributed to the specified activity codes in spreadsheet TW-3e.

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

(i) Confirmed.

(ii) Only volume variable costs are distributed to the subclasses of mail.

The costs for passport-related activities should fall into the non-volume variable-portion of the cost pool and, thus, not be distributed to subclass. Additionally, as the passport-related tallies are not-handling-mail, their impact on the distribution keys is negligible. Please note that under the new MODS methodology, distributing tallies to the subclasses of mail and distributing variable costs to the subclasses of mail are not the same thing.

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
1st L&P	1	53	507	244	373	0	57	0	1,234
1st L&P	2	0	166	107	48	0	0	0	321
1st L&P	3	0	8	0	0	0	0	0	8
1st L&P	5	0	0	0	0	0	26	0	26
PvtCds	1	0	29	0	0	0	0	0	29
PvtCds	2	0	0	0	0	0	0	0	0
PvtCds	3	0	0	0	0	0	0	0	0
PvtCds	5	0	0	0	0	0	0	0	0
PostalCds	1	0	0	0	0	0	0	0	0
PostalCds	2	0	0	0	0	0	0	0	0
PostalCds	3	0	0	0	0	0	0	0	0
PostalCds	5	0	0	0	0	0	0	0	0
PreL	1	53	0	0	0	0	28	0	82
PreL	2	0	0	0	82	0	0	0	82
PreL	3	0	0	0	0	0	21	0	21
PreL	5	0	0	0	0	0	0	0	0
PreCds	1	0	0	0	0	0	0	0	0
PreCds	2	0	0	0	0	0	0	0	0
PreCds	3	0	0	0	0	0	0	0	0
PreCds	5	0	0	0	0	0	0	0	0
Priority	1	0	126	138	42	33	26	0	366
Priority	2	0	60	79	0	0	0	0	139
Priority	3	0	0	0	0	0	28	0	28
Priority	5	0	0	0	0	0	0	0	0
Express	1	0	0	0	0	0	0	0	0
Express	2	0	0	0	0	0	6	0	6
Express	3	0	0	0	0	0	0	0	0
Express	5	0	0	0	0	0	0	0	0
2nd IC	1	5	3	0	0	0	1	0	9
2nd IC	2	0	2	0	7	0	4	0	13
2nd IC	3	0	0	0	0	0	1	0	1
2nd IC	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
2nd NP	1	224	123	0	49	0	58	0	453
2nd NP	2	49	147	1	190	0	151	0	537
2nd NP	3	0	0	0	0	0	58	0	58
2nd NP	5	0	0	0	0	0	0	0	0
2nd CL	1	2	0	0	0	0	0	0	2
2nd CL	2	49	84	0	2	0	30	0	164
2nd CL	3	0	0	0	0	0	28	0	28
2nd CL	5	0	0	0	0	0	0	0	0
2nd Reg	1	1,330	442	12	158	0	402	0	2,346
2nd Reg	2	485	512	42	383	107	414	0	1,923
2nd Reg	3	0	0	0	0	0	165	0	165
2nd Reg	5	0	0	0	0	0	0	0	0
3rd SP	1	106	630	590	160	33	238	0	1,756
3rd SP	2	49	670	865	401	0	38	0	2,021
3rd SP	3	0	34	0	0	0	138	0	172
3rd SP	5	0	56	0	0	0	0	0	58
BRCRT	1	867	840	242	433	144	435	0	2,960
BRCRT	2	266	623	173	275	33	574	0	1,943
BRCRT	3	0	7	0	0	0	122	0	129
BRCRT	5	0	0	0	0	0	0	0	0
BRO	1	3,416	5,265	5,207	4,782	990	1,518	0	21,179
BRO	2	1,632	7,047	8,842	4,610	579	2,406	0	25,117
BRO	3	0	261	0	0	0	607	0	868
BRO	5	0	103	0	0	0	26	0	129
NPCRT	1	0	58	0	39	0	26	0	122
NPCRT	2	44	55	48	27	33	54	0	262
NPCRT	3	0	70	0	0	0	0	0	70
NPCRT	5	0	0	0	0	0	0	0	0
NPO	1	496	715	412	1,112	209	279	0	3,223
NPO	2	250	1,502	420	784	32	313	0	3,301
NPO	3	0	82	0	0	0	93	0	174
NPO	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
4th ZPP	1	537	3,828	2,741	1,275	2,315	1,038	0	11,534
4th ZPP	2	869	2,865	4,925	578	859	2,290	0	12,386
4th ZPP	3	0	22	0	0	0	508	0	530
4th ZPP	5	0	60	0	0	0	0	0	60
BPM	1	174	1,141	2,509	311	397	422	0	4,954
BPM	2	174	1,448	4,034	335	113	768	0	6,870
BPM	3	0	64	0	0	0	94	0	159
BPM	5	0	0	0	0	0	0	0	0
SPC	1	214	1,232	3,257	516	183	406	0	5,809
SPC	2	307	1,546	6,581	345	226	539	0	9,543
SPC	3	0	73	0	0	0	95	0	168
SPC	5	0	29	0	0	0	0	0	29
LIB	1	105	343	715	42	307	180	0	1,691
LIB	2	53	181	745	100	171	128	0	1,377
LIB	3	0	47	0	0	0	28	0	75
LIB	5	0	29	0	0	0	0	0	29
Mailgrams	1	0	0	0	0	0	0	0	0
Mailgrams	2	0	0	0	0	0	0	0	0
Mailgrams	3	0	0	0	0	0	0	0	0
Mailgrams	5	0	0	0	0	0	0	0	0
Free	1	0	136	353	162	0	0	0	652
Free	2	0	29	0	0	0	25	0	54
Free	3	0	0	0	0	0	0	0	0
Free	5	0	0	0	0	0	0	0	0
Intl	1	480	1,558	3,053	834	229	202	0	6,356
Intl	2	93	426	12	337	56	91	0	1,015
Intl	3	0	655	0	0	0	432	0	1,087
Intl	5	0	14	0	0	0	0	0	14
USPS	1	87	303	125	124	211	26	0	876
USPS	2	0	0	101	0	68	140	0	309
USPS	3	0	22	0	0	0	0	0	22
USPS	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
Registry	1	0	23	0	0	0	0	0	23
Registry	2	0	53	0	0	0	0	0	53
Registry	3	0	22	0	0	0	0	0	22
Registry	5	0	7	0	0	0	0	0	7
Certified	1	0	0	0	0	0	0	0	0
Certified	2	0	0	0	0	0	0	0	0
Certified	3	0	0	0	0	0	0	0	0
Certified	5	0	0	0	0	0	0	0	0
Insurance	1	0	0	0	0	0	0	0	0
Insurance	2	0	0	0	0	0	0	0	0
Insurance	3	0	8	0	0	0	0	0	8
Insurance	5	0	0	0	0	0	0	0	0
COD	1	0	0	0	0	0	0	0	0
COD	2	0	0	0	0	0	0	0	0
COD	3	0	0	0	0	0	0	0	0
COD	5	0	0	0	0	0	0	0	0
Sp Delvry	1	0	0	0	0	0	0	0	0
Sp Delvry	2	0	0	0	0	0	0	0	0
Sp Delvry	3	0	0	0	0	0	0	0	0
Sp Delvry	5	0	0	0	0	0	0	0	0
Oth SSv	1	0	29	43	0	0	0	0	72
Oth SSv	2	0	55	0	0	0	0	0	55
Oth SSv	3	0	0	0	0	0	6	0	6
Oth SSv	5	0	0	0	0	0	0	0	0
5301	1	0	29	0	0	0	0	0	29
5301	2	0	0	0	0	0	0	0	0
5301	3	0	0	0	0	0	0	0	0
5301	5	0	0	0	0	0	0	0	0
5302	1	0	0	0	0	0	0	0	0
5302	2	0	0	0	0	0	0	0	0
5302	3	0	0	0	0	0	0	0	0
5302	5	0	0	0	0	0	0	0	0

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
5303	1	0	0	0	0	0	0	0	0
5303	2	0	0	0	0	0	0	0	0
5303	3	0	0	0	0	0	0	0	0
5303	5	0	0	0	0	0	0	0	0
5331	1	0	0	0	11	0	0	0	11
5331	2	53	0	0	0	0	28	0	82
5331	3	0	0	0	0	0	0	0	0
5331	5	0	0	0	0	0	0	0	0
5340	1	0	32	0	0	0	0	0	32
5340	2	53	86	0	125	0	0	0	264
5340	3	0	0	0	0	0	0	0	0
5340	5	0	27	0	0	0	0	0	27
5341	1	53	18	0	7	0	126	0	204
5341	2	0	17	0	39	0	82	0	139
5341	3	0	0	0	0	0	28	0	28
5341	5	0	0	0	0	0	0	0	0
5345	1	0	81	0	0	0	30	0	111
5345	2	0	12	0	0	0	28	0	40
5345	3	0	0	0	0	0	0	0	0
5345	5	0	0	0	0	0	0	0	0
5460	1	103	15	62	69	71	0	0	321
5460	2	0	65	52	0	0	93	0	210
5460	3	0	0	0	0	0	14	0	14
5460	5	0	7	0	0	0	0	0	7
5461	1	0	15	91	12	0	0	0	117
5461	2	0	44	0	0	0	0	0	44
5461	3	0	7	0	0	0	50	0	57
5461	5	0	0	0	0	0	0	0	0
5610	1	0	809	0	0	0	0	0	809
5610	2	0	358	0	0	0	54	0	411
5610	3	0	7	0	0	0	0	0	7
5610	5	0	69	0	0	0	26	0	95

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
5620	1	0	332	0	0	0	110	0	443
5620	2	0	208	0	0	0	0	0	208
5620	3	0	0	0	0	0	0	0	0
5620	5	0	6	0	0	0	0	0	6
5700	1	0	3,258	6,301	768	2,215	226	0	12,768
5700	2	0	3,388	5,841	410	866	411	0	10,915
5700	3	0	168	0	0	0	269	0	437
5700	5	0	232	0	0	0	0	0	232
5750	1	5,815	20,030	0	6,741	2,427	18,403	0	53,416
5750	2	3,695	10,525	0	3,794	558	15,288	0	33,861
5750	3	0	576	0	0	0	3,614	0	4,190
5750	5	0	4,764	0	0	0	6,691	0	11,456
5020	1	0	0	0	0	0	0	0	0
5020	2	0	0	0	0	0	0	0	0
5020	3	0	0	0	0	0	0	0	0
5020	5	0	0	0	0	0	0	0	0
5040	1	0	0	0	0	0	0	0	0
5040	2	0	0	0	0	0	0	0	0
5040	3	0	0	0	0	0	0	0	0
5040	5	0	0	0	0	0	0	0	0
5050	1	0	0	0	0	0	0	0	0
5050	2	0	0	0	0	0	0	0	0
5050	3	0	0	0	0	0	0	0	0
5050	5	0	0	0	0	0	0	0	0
5060	1	0	0	0	0	0	0	0	0
5060	2	0	0	0	0	0	0	0	0
5060	3	0	0	0	0	0	0	0	0
5060	5	0	0	0	0	0	0	0	0
5070	1	0	0	0	0	0	0	0	0
5070	2	0	0	0	0	0	0	0	0
5070	3	0	0	0	0	0	0	0	0
5070	5	0	0	0	0	0	0	0	0

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
5080	1	0	0	0	0	0	0	0	0
5080	2	0	0	0	0	0	0	0	0
5080	3	0	0	0	0	0	0	0	0
5080	5	0	0	0	0	0	0	0	0
5090	1	0	0	0	0	0	0	0	0
5090	2	0	0	0	0	0	0	0	0
5090	3	0	0	0	0	0	0	0	0
5090	5	0	0	0	0	0	0	0	0
5110	1	0	0	0	0	0	0	0	0
5110	2	0	0	0	0	0	0	0	0
5110	3	0	0	0	0	0	0	0	0
5110	5	0	0	0	0	0	0	0	0
5120	1	0	0	0	0	0	0	0	0
5120	2	0	0	0	0	0	0	0	0
5120	3	0	0	0	0	0	0	0	0
5120	5	0	0	0	0	0	0	0	0
5130	1	0	0	0	0	0	0	0	0
5130	2	0	0	0	0	0	0	0	0
5130	3	0	0	0	0	0	0	0	0
5130	5	0	0	0	0	0	0	0	0
5170	1	0	0	0	0	0	0	0	0
5170	2	0	0	0	0	0	0	0	0
5170	3	0	0	0	0	0	0	0	0
5170	5	0	0	0	0	0	0	0	0
5180	1	0	0	0	0	0	0	0	0
5180	2	0	0	0	0	0	0	0	0
5180	3	0	0	0	0	0	0	0	0
5180	5	0	0	0	0	0	0	0	0
6000	1	0	0	0	0	0	0	0	0
6000	2	0	0	0	0	0	0	0	0
6000	3	0	0	0	0	0	0	0	0
6000	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6010	1	0	0	0	0	0	0	0	0
6010	2	0	0	0	0	0	0	0	0
6010	3	0	0	0	0	0	0	0	0
6010	5	0	0	0	0	0	0	0	0
6020	1	0	0	0	0	0	0	0	0
6020	2	0	0	0	0	0	0	0	0
6020	3	0	0	0	0	0	0	0	0
6020	5	0	0	0	0	0	0	0	0
6030	1	0	0	0	0	0	0	0	0
6030	2	0	0	0	0	0	0	0	0
6030	3	0	0	0	0	0	0	0	0
6030	5	0	0	0	0	0	0	0	0
6040	1	0	0	0	0	0	0	0	0
6040	2	0	0	0	0	0	0	0	0
6040	3	0	0	0	0	0	0	0	0
6040	5	0	0	0	0	0	0	0	0
6045	1	0	0	0	0	0	0	0	0
6045	2	0	0	0	0	0	0	0	0
6045	3	0	0	0	0	0	0	0	0
6045	5	0	0	0	0	0	0	0	0
6050	1	0	0	0	0	0	0	0	0
6050	2	0	0	0	0	0	0	0	0
6050	3	0	0	0	0	0	0	0	0
6050	5	0	0	0	0	0	0	0	0
6070	1	0	0	0	0	0	0	0	0
6070	2	0	0	0	0	0	0	0	0
6070	3	0	0	0	0	0	0	0	0
6070	5	0	0	0	0	0	0	0	0
6073	1	0	0	0	0	0	0	0	0
6073	2	0	0	0	0	0	0	0	0
6073	3	0	0	0	0	0	0	0	0
6073	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6080	1	0	0	0	0	0	0	0	0
6080	2	0	0	0	0	0	0	0	0
6080	3	0	0	0	0	0	0	0	0
6080	5	0	0	0	0	0	0	0	0
6110	1	0	0	0	0	0	0	0	0
6110	2	0	0	0	0	0	0	0	0
6110	3	0	0	0	0	0	0	0	0
6110	5	0	0	0	0	0	0	0	0
6120	1	0	0	0	0	0	0	0	0
6120	2	0	0	0	0	0	0	0	0
6120	3	0	0	0	0	0	0	0	0
6120	5	0	0	0	0	0	0	0	0
6130	1	0	0	0	0	0	0	0	0
6130	2	0	0	0	0	0	0	0	0
6130	3	0	0	0	0	0	0	0	0
6130	5	0	0	0	0	0	0	0	0
6140	1	0	0	0	0	0	0	0	0
6140	2	0	0	0	0	0	0	0	0
6140	3	0	0	0	0	0	0	0	0
6140	5	0	0	0	0	0	0	0	0
6170	1	0	0	0	0	0	0	0	0
6170	2	0	0	0	0	0	0	0	0
6170	3	0	0	0	0	0	0	0	0
6170	5	0	0	0	0	0	0	0	0
6180	1	0	0	0	0	0	0	0	0
6180	2	0	0	0	0	0	0	0	0
6180	3	0	0	0	0	0	0	0	0
6180	5	0	0	0	0	0	0	0	0
6200	1	0	0	0	0	0	0	0	0
6200	2	0	0	0	0	0	0	0	0
6200	3	0	0	0	0	0	0	0	0
6200	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6210	1	0	0	0	0	0	1,093	0	1,093
6210	2	0	0	0	0	0	1,336	0	1,336
6210	3	0	0	0	0	0	748	0	748
6210	5	0	0	0	0	0	847	0	847
6220	1	0	0	0	0	0	0	0	0
6220	2	0	0	0	0	0	0	0	0
6220	3	0	0	0	0	0	0	0	0
6220	5	0	0	0	0	0	0	0	0
6230	1	0	0	0	0	0	0	0	0
6230	2	0	8	0	0	0	0	0	8
6230	3	0	8	0	0	0	0	0	8
6230	5	0	78	0	0	0	0	0	78
6231	1	0	0	0	0	0	0	0	0
6231	2	0	0	0	0	0	0	0	0
6231	3	0	0	0	0	0	0	0	0
6231	5	0	27	0	0	0	0	0	27
6240	1	0	174	0	0	0	0	0	174
6240	2	0	0	0	0	0	0	0	0
6240	3	0	102	0	0	0	0	0	102
6240	5	0	265	0	0	0	0	0	265
6270	1	0	0	0	0	0	0	0	0
6270	2	0	0	0	0	0	0	0	0
6270	3	0	0	0	0	0	0	0	0
6270	5	0	0	0	0	0	0	0	0
6320	1	0	0	0	0	0	0	0	0
6320	2	0	0	0	0	0	0	0	0
6320	3	0	0	0	0	0	0	0	0
6320	5	0	0	0	0	0	0	0	0
6330	1	0	0	0	0	0	0	0	0
6330	2	0	0	0	0	0	0	0	0
6330	3	0	0	0	0	0	0	0	0
6330	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6420	1	0	0	0	0	0	0	0	0
6420	2	0	49	0	0	0	0	0	49
6420	3	0	0	0	0	0	0	0	0
6420	5	0	278	0	0	0	0	0	278
6430	1	0	29	0	0	0	0	0	29
6430	2	0	0	0	0	0	0	0	0
6430	3	0	0	0	0	0	0	0	0
6430	5	0	0	0	0	0	0	0	0
6460	1	0	0	0	0	0	0	0	0
6460	2	0	0	0	0	0	0	0	0
6460	3	0	0	0	0	0	0	0	0
6460	5	0	0	0	0	0	0	0	0
6480	1	0	0	0	0	0	0	0	0
6480	2	0	0	0	0	0	0	0	0
6480	3	0	0	0	0	0	0	0	0
6480	5	0	0	0	0	0	0	0	0
6495	1	0	0	0	0	0	0	0	0
6495	2	0	0	0	0	0	0	0	0
6495	3	0	0	0	0	0	0	0	0
6495	5	0	0	0	0	0	0	0	0
6500	1	0	0	0	0	0	0	0	0
6500	2	0	0	0	0	0	0	0	0
6500	3	0	0	0	0	0	0	0	0
6500	5	0	0	0	0	0	0	0	0
6511	1	0	0	0	0	0	0	0	0
6511	2	0	0	0	0	0	0	0	0
6511	3	0	0	0	0	0	0	0	0
6511	5	0	0	0	0	0	0	0	0
6512	1	0	0	0	0	0	0	0	0
6512	2	0	0	0	0	0	0	0	0
6512	3	0	0	0	0	0	0	0	0
6512	5	0	0	0	0	0	0	0	0

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6514	1	0	0	0	0	0	0	0	0
6514	2	0	0	0	0	0	0	0	0
6514	3	0	0	0	0	0	0	0	0
6514	5	0	0	0	0	0	0	0	0
6516	1	0	0	0	0	0	0	0	0
6516	2	0	0	0	0	0	0	0	0
6516	3	0	0	0	0	0	0	0	0
6516	5	0	0	0	0	0	0	0	0
6519	1	0	0	0	0	0	0	0	0
6519	2	0	0	0	0	0	0	0	0
6519	3	0	0	0	0	0	0	0	0
6519	5	0	0	0	0	0	0	0	0
6521	1	0	0	0	0	0	0	0	0
6521	2	0	0	0	0	0	0	49	49
6521	3	0	0	0	0	0	0	0	0
6521	5	0	0	0	0	0	0	114,617	114,617
6522	1	0	0	0	0	0	0	0	0
6522	2	0	0	0	0	0	0	0	0
6522	3	0	0	0	0	0	0	0	0
6522	5	0	0	0	0	0	0	0	0
6523	1	612	10,117	242	3,821	1,859	5,110	0	21,761
6523	2	202	7,678	482	2,956	876	3,824	0	16,018
6523	3	0	137	0	0	0	838	0	975
6523	5	0	940	0	0	0	3,555	0	4,495
6570	1	0	0	0	0	0	0	0	0
6570	2	0	0	0	0	0	0	0	0
6570	3	0	0	0	0	0	0	0	0
6570	5	0	60	0	0	0	0	0	60
6580	1	0	0	0	0	0	0	0	0
6580	2	0	0	0	0	0	0	0	0
6580	3	0	0	0	0	0	0	0	0
6580	5	0	32	0	0	0	0	0	32

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Basic Fn.	SSM	Allied	PSM	BMC SPB	NMO	Platform	Breaks	Total BMCs
6610	1	0	0	0	0	0	0	0	0
6610	2	0	0	0	0	0	0	0	0
6610	3	0	0	0	0	0	0	0	0
6610	5	0	0	0	0	0	0	0	0
6620	1	0	0	0	0	0	0	0	0
6620	2	0	0	0	0	0	0	0	0
6620	3	0	0	0	0	0	0	0	0
6620	5	0	0	0	0	0	0	0	0
6630	1	0	0	0	0	0	0	0	0
6630	2	0	0	0	0	0	0	0	0
6630	3	0	0	0	0	0	0	0	0
6630	5	0	0	0	0	0	0	0	0
6640	1	0	0	0	0	0	0	0	0
6640	2	0	0	0	0	0	0	0	0
6640	3	0	0	0	0	0	0	0	0
6640	5	0	0	0	0	0	0	0	0
6650	1	0	0	0	0	0	0	0	0
6650	2	0	0	0	0	0	0	0	0
6650	3	0	0	0	0	0	0	0	0
6650	5	0	0	0	0	0	0	0	0
6660	1	0	0	0	0	0	0	0	0
6660	2	0	0	0	0	0	0	0	0
6660	3	0	0	0	0	0	0	0	0
6660	5	0	0	0	0	0	0	0	0
<b>Grand Total</b>		<b>23,051</b>	<b>101,434</b>	<b>59,686</b>	<b>37,653</b>	<b>16,200</b>	<b>78,714</b>	<b>114,666</b>	<b>431,404</b>

Class/Act. Code	Outgoing	Incoming	Non-MODS			Breaks	Total Non-MODS
			Transit	Other			
1st L&P	69,978	0	0	10,652	0	80,630	
1st L&P	0	410,887	0	13,814	0	424,701	
1st L&P	0	0	2,239	134	0	2,373	
1st L&P	0	0	0	157	0	157	
PvtCds	1,917	0	0	341	0	2,258	
PvtCds	0	13,613	0	432	0	14,045	
PvtCds	0	0	125	5	0	131	
PvtCds	0	0	0	9	0	9	
PostalCds	156	0	0	9	0	165	
PostalCds	0	389	0	8	0	397	
PostalCds	0	0	0	0	0	0	
PostalCds	0	0	0	0	0	0	
PreL	13,663	0	0	1,676	0	15,339	
PreL	0	115,473	0	3,669	0	119,142	
PreL	0	0	1,034	46	0	1,079	
PreL	0	0	0	62	0	62	
PreCds	700	0	0	83	0	783	
PreCds	0	3,927	0	119	0	4,047	
PreCds	0	0	83	2	0	85	
PreCds	0	0	0	2	0	2	
Priority	4,258	0	0	1,007	0	5,265	
Priority	0	30,662	0	1,007	0	31,668	
Priority	0	0	0	20	0	20	
Priority	0	0	0	7	0	7	
Express	1,319	0	0	202	0	1,522	
Express	0	5,101	0	179	0	5,280	
Express	0	0	348	22	0	370	
Express	0	0	0	1	0	1	
2nd IC	322	0	0	15	0	337	
2nd IC	0	2,827	0	68	0	2,895	
2nd IC	0	0	0	0	0	0	
2nd IC	0	0	0	0	0	0	

Class/Act. Code	Non-MODS					Total Non-MODS
	Outgoing	Incoming	Transit	Other	Breaks	
2nd NP	499	0	0	115	0	614
2nd NP	0	8,101	0	255	0	8,356
2nd NP	0	0	40	4	0	43
2nd NP	0	0	0	6	0	6
2nd CL	1	0	0	4	0	5
2nd CL	0	704	0	15	0	720
2nd CL	0	0	0	0	0	0
2nd CL	0	0	0	0	0	0
2nd Reg	4,447	0	0	560	0	5,008
2nd Reg	0	46,797	0	1,514	0	48,310
2nd Reg	0	0	0	25	0	25
2nd Reg	0	0	0	29	0	29
3rd SP	1,690	0	0	164	0	1,854
3rd SP	0	5,138	0	165	0	5,303
3rd SP	0	0	0	3	0	3
3rd SP	0	0	0	12	0	12
BRCRT	2,556	0	0	210	0	2,766
BRCRT	0	39,122	0	994	0	40,116
BRCRT	0	0	0	3	0	3
BRCRT	0	0	0	9	0	9
BRO	17,705	0	0	1,778	0	19,483
BRO	0	159,279	0	5,363	0	164,642
BRO	0	0	192	31	0	223
BRO	0	0	0	41	0	41
NPCRT	229	0	0	31	0	260
NPCRT	0	3,025	0	99	0	3,124
NPCRT	0	0	24	1	0	25
NPCRT	0	0	0	0	0	0
NPO	3,949	0	0	513	0	4,462
NPO	0	31,436	0	1,268	0	32,703
NPO	0	0	284	8	0	293
NPO	0	0	0	9	0	9

Class/Act. Code	Non-MODS				Breaks	Total Non-MODS
	Outgoing	Incoming	Transit	Other		
4th ZPP	807	0	0	81	0	888
4th ZPP	0	7,986	0	249	0	8,235
4th ZPP	0	0	150	7	0	157
4th ZPP	0	0	0	1	0	1
BPM	615	0	0	48	0	663
BPM	0	5,890	0	139	0	6,030
BPM	0	0	122	2	0	124
BPM	0	0	0	1	0	1
SPC	452	0	0	34	0	487
SPC	0	3,973	0	113	0	4,086
SPC	0	0	64	2	0	66
SPC	0	0	0	1	0	1
LIB	334	0	0	18	0	352
LIB	0	529	0	19	0	547
LIB	0	0	0	0	0	0
LIB	0	0	0	0	0	0
Mailgrams	0	0	0	1	0	1
Mailgrams	0	0	0	0	0	0
Mailgrams	0	0	0	0	0	0
Mailgrams	0	0	0	0	0	0
Free	165	0	0	16	0	181
Free	0	304	0	22	0	326
Free	0	0	0	0	0	0
Free	0	0	0	0	0	0
Intl	1,492	0	0	642	0	2,135
Intl	0	2,473	0	192	0	2,665
Intl	0	0	13	37	0	49
Intl	0	0	0	5	0	5
USPS	2,279	0	0	199	0	2,477
USPS	0	6,236	0	179	0	6,415
USPS	0	0	65	3	0	67
USPS	0	0	0	25	0	25

Class/Act. Code	Outgoing	Non-MODS			Breaks	Total Non-MODS
		Incoming	Transit	Other		
Registry	785	0	0	191	0	976
Registry	0	4,424	0	275	0	4,700
Registry	0	0	73	77	0	151
Registry	0	0	0	48	0	48
Certified	804	0	0	23	0	827
Certified	0	8,414	0	179	0	8,593
Certified	0	0	0	1	0	1
Certified	0	0	0	16	0	16
Insurance	42	0	0	2	0	43
Insurance	0	338	0	5	0	343
Insurance	0	0	0	0	0	0
Insurance	0	0	0	0	0	0
COD	64	0	0	2	0	66
COD	0	967	0	19	0	986
COD	0	0	0	0	0	0
COD	0	0	0	2	0	2
Sp Delvry	0	0	0	0	0	0
Sp Delvry	0	0	0	3	0	3
Sp Delvry	0	0	0	0	0	0
Sp Delvry	0	0	0	1	0	1
Oth SSv	1,860	0	0	171	0	2,031
Oth SSv	0	12,505	0	406	0	12,911
Oth SSv	0	0	0	6	0	6
Oth SSv	0	0	0	38	0	38
5301	135	0	0	11	0	146
5301	0	138	0	8	0	147
5301	0	0	0	0	0	0
5301	0	0	0	0	0	0
5302	14	0	0	15	0	28
5302	0	91	0	8	0	99
5302	0	0	0	2	0	2
5302	0	0	0	0	0	0

Class/Act. Code	Outgoing	Incoming	Non-MODS		Breaks	Total Non-MODS
			Transit	Other		
5303	0	0	0	3	0	3
5303	0	0	0	0	0	0
5303	0	0	0	2	0	2
5303	0	0	0	0	0	0
5331	36	0	0	3	0	38
5331	0	82	0	4	0	86
5331	0	0	0	0	0	0
5331	0	0	0	0	0	0
5340	241	0	0	28	0	269
5340	0	2,368	0	73	0	2,441
5340	0	0	0	1	0	1
5340	0	0	0	2	0	2
5341	0	0	0	4	0	4
5341	0	148	0	7	0	155
5341	0	0	0	0	0	0
5341	0	0	0	0	0	0
5345	0	0	0	1	0	1
5345	0	54	0	3	0	57
5345	0	0	0	0	0	0
5345	0	0	0	0	0	0
5460	13	0	0	9	0	22
5460	0	41	0	5	0	46
5460	0	0	0	2	0	2
5460	0	0	0	0	0	0
5461	14	0	0	5	0	18
5461	0	0	0	0	0	0
5461	0	0	0	1	0	1
5461	0	0	0	0	0	0
5610	12,634	0	0	2,685	0	15,319
5610	0	63,660	0	3,489	0	67,149
5610	0	0	239	17	0	257
5610	0	0	0	59	0	59

Class/Act. Code	Outgoing	Incoming	Non-MODS			Breaks	Total Non-MODS
			Transit	Other			
5620	3,813	0	0	959	0	4,772	
5620	0	23,823	0	1,353	0	25,176	
5620	0	0	0	7	0	7	
5620	0	0	0	19	0	19	
5700	1,886	0	0	343	0	2,229	
5700	0	11,287	0	429	0	11,715	
5700	0	0	0	6	0	6	
5700	0	0	0	14	0	14	
5750	40,064	0	0	5,669	0	45,733	
5750	0	85,152	0	4,861	0	89,813	
5750	0	0	1,490	632	0	2,122	
5750	0	0	0	1,162	0	1,162	
5020	0	0	0	0	0	0	
5020	0	0	0	0	0	0	
5020	0	0	0	0	0	0	
5020	0	0	0	7	0	7	
5040	0	0	0	0	0	0	
5040	0	0	0	0	0	0	
5040	0	0	0	0	0	0	
5040	0	0	0	181	0	181	
5050	0	0	0	0	0	0	
5050	0	0	0	0	0	0	
5050	0	0	0	0	0	0	
5050	0	0	0	4	0	4	
5060	0	0	0	0	0	0	
5060	0	0	0	0	0	0	
5060	0	0	0	0	0	0	
5060	0	0	0	0	0	0	
5070	0	0	0	0	0	0	
5070	0	0	0	0	0	0	
5070	0	0	0	0	0	0	
5070	0	0	0	7	0	7	

Class/Act. Code	Outgoing	Incoming	Non-MODS			Breaks	Total Non-MODS
			Transit	Other			
5080	0	0	0	0	0	0	0
5080	0	0	0	0	0	0	0
5080	0	0	0	0	0	0	0
5080	0	0	0	14	0	0	14
5090	0	0	0	0	0	0	0
5090	0	0	0	0	0	0	0
5090	0	0	0	0	0	0	0
5090	0	0	0	1	0	0	1
5110	0	0	0	0	0	0	0
5110	0	0	0	0	0	0	0
5110	0	0	0	0	0	0	0
5110	0	0	0	4	0	0	4
5120	0	0	0	0	0	0	0
5120	0	0	0	0	0	0	0
5120	0	0	0	0	0	0	0
5120	0	0	0	4	0	0	4
5130	0	0	0	0	0	0	0
5130	0	0	0	0	0	0	0
5130	0	0	0	0	0	0	0
5130	0	0	0	2	0	0	2
5170	0	0	0	0	0	0	0
5170	0	0	0	0	0	0	0
5170	0	0	0	0	0	0	0
5170	0	0	0	21	0	0	21
5180	0	0	0	0	0	0	0
5180	0	0	0	0	0	0	0
5180	0	0	0	0	0	0	0
5180	0	0	0	1	0	0	1
6000	0	0	0	0	0	0	0
6000	0	0	0	0	0	0	0
6000	0	0	0	0	0	0	0
6000	0	0	0	40	0	0	40

Class/Act. Code	Outgoing	Incoming	Non-MODS		Breaks	Total Non-MODS
			Transit	Other		
6010	0	0	0	0	0	0
6010	0	0	0	0	0	0
6010	0	0	0	0	0	0
6010	0	0	0	132	0	132
6020	0	0	0	0	0	0
6020	0	0	0	0	0	0
6020	0	0	0	0	0	0
6020	0	0	0	63	0	63
6030	0	0	0	0	0	0
6030	0	0	0	0	0	0
6030	0	0	0	0	0	0
6030	0	0	0	43	0	43
6040	0	0	0	0	0	0
6040	0	0	0	0	0	0
6040	0	0	0	0	0	0
6040	0	0	0	20	0	20
6045	0	0	0	0	0	0
6045	0	0	0	0	0	0
6045	0	0	0	0	0	0
6045	0	0	0	8	0	8
6050	0	0	0	0	0	0
6050	0	0	0	0	0	0
6050	0	0	0	0	0	0
6050	0	0	0	2	0	2
6070	0	0	0	0	0	0
6070	0	0	0	0	0	0
6070	0	0	0	0	0	0
6070	0	0	0	11	0	11
6073	0	0	0	0	0	0
6073	0	0	0	0	0	0
6073	0	0	0	0	0	0
6073	0	0	0	6	0	6

Class/Act. Code	Outgoing	Incoming	Non-MODS			Breaks	Total Non-MODS
			Transit	Other			
6080	0	0	0	0	0	0	0
6080	0	0	0	0	0	0	0
6080	0	0	0	0	0	0	0
6080	0	0	0	5	0	0	5
6110	0	0	0	0	0	0	0
6110	0	0	0	0	0	0	0
6110	0	0	0	0	0	0	0
6110	0	0	0	5	0	0	5
6120	0	0	0	0	0	0	0
6120	0	0	0	0	0	0	0
6120	0	0	0	0	0	0	0
6120	0	0	0	10	0	0	10
6130	0	0	0	0	0	0	0
6130	0	0	0	0	0	0	0
6130	0	0	0	0	0	0	0
6130	0	0	0	3	0	0	3
6140	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0
6140	0	0	0	0	0	0	0
6170	0	0	0	0	0	0	0
6170	0	0	0	0	0	0	0
6170	0	0	0	0	0	0	0
6170	0	0	0	333	0	0	333
6180	0	0	0	0	0	0	0
6180	0	0	0	0	0	0	0
6180	0	0	0	0	0	0	0
6180	0	0	0	6	0	0	6
6200	0	0	0	0	0	0	0
6200	0	0	0	0	0	0	0
6200	0	0	0	0	0	0	0
6200	0	0	0	20	0	0	20

Class/Act. Code	Outgoing	Incoming	Non-MODS		Breaks	Total Non-MODS
			Transit	Other		
6210	13,400	0	0	556	0	13,957
6210	0	6,019	0	270	0	6,289
6210	0	0	646	95	0	741
6210	0	0	0	401	0	401
6220	85	0	0	6	0	91
6220	0	13	0	15	0	28
6220	0	0	320	4	0	324
6220	0	0	0	11	0	11
6230	1,305	0	0	154	0	1,460
6230	0	7,062	0	246	0	7,307
6230	0	0	81	25	0	106
6230	0	0	0	344	0	344
6231	1,148	0	0	195	0	1,343
6231	0	2,382	0	163	0	2,545
6231	0	0	98	53	0	151
6231	0	0	0	105	0	105
6240	1,658	0	0	66	0	1,724
6240	0	4,637	0	104	0	4,742
6240	0	0	0	3	0	3
6240	0	0	0	107	0	107
6270	0	0	0	0	0	0
6270	0	0	0	0	0	0
6270	0	0	0	0	0	0
6270	0	0	0	1	0	1
6320	0	0	0	1	0	1
6320	0	0	0	0	0	0
6320	0	0	0	0	0	0
6320	0	0	0	86	0	86
6330	0	0	0	5	0	5
6330	0	0	0	7	0	7
6330	0	0	0	2	0	2
6330	0	0	0	72	0	72

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Non-MODS					Total Non-MODS
	Outgoing	Incoming	Transit	Other	Breaks	
6420	0	0	0	0	0	0
6420	0	3,706	0	69	0	3,776
6420	0	0	0	0	0	0
6420	0	0	0	207	0	207
6430	995	0	0	19	0	1,015
6430	0	12,544	0	279	0	12,823
6430	0	0	0	0	0	0
6430	0	0	0	379	0	379
6460	0	0	0	0	0	0
6460	0	0	0	0	0	0
6460	0	0	0	0	0	0
6460	0	0	0	19	0	19
6480	62	0	0	8	0	71
6480	0	0	0	2	0	2
6480	0	0	0	0	0	0
6480	0	0	0	69	0	69
6495	0	0	0	1	0	1
6495	0	0	0	0	0	0
6495	0	0	0	1	0	1
6495	0	0	0	26	0	26
6500	0	0	0	0	0	0
6500	0	0	0	0	0	0
6500	0	0	0	0	0	0
6500	0	0	0	21	0	21
6511	0	0	0	0	0	0
6511	0	0	0	0	0	0
6511	0	0	0	0	0	0
6511	0	0	0	11	0	11
6512	0	0	0	0	0	0
6512	0	0	0	0	0	0
6512	0	0	0	0	0	0
6512	0	0	0	5	0	5

Attachment 1, Response to MPA/USPS-T12-2

Class/Act. Code	Outgoing	Incoming	Non-MODS			Breaks	Total Non-MODS
			Transit	Other			
6514	0	0	0	0	0	0	0
6514	0	0	0	0	0	0	0
6514	0	0	0	0	0	0	0
6514	0	0	0	1	0	0	1
6516	0	0	0	1	0	0	1
6516	0	0	0	1	0	0	1
6516	0	0	0	0	0	0	0
6516	0	0	0	19	0	0	19
6519	0	0	0	0	0	0	0
6519	0	0	0	1	0	0	1
6519	0	0	0	0	0	0	0
6519	0	0	0	135	0	0	135
6521	0	0	0	0	0	0	0
6521	0	0	0	0	0	0	0
6521	0	0	0	0	0	0	0
6521	0	0	0	0	156,352	0	156,352
6522	0	0	0	0	0	0	0
6522	0	0	0	0	0	0	0
6522	0	0	0	0	0	0	0
6522	0	0	0	1,806	0	0	1,806
6523	23,855	0	0	3,696	0	0	27,550
6523	0	79,417	0	4,339	0	0	83,756
6523	0	0	1,347	183	0	0	1,531
6523	0	0	0	1,014	0	0	1,014
6570	1,334	0	0	281	0	0	1,615
6570	0	3,149	0	101	0	0	3,249
6570	0	0	300	20	0	0	319
6570	0	0	0	380	0	0	380
6580	253	0	0	14	0	0	267
6580	0	8,462	0	220	0	0	8,682
6580	0	0	0	3	0	0	3
6580	0	0	0	158	0	0	158

Class/Act. Code	Non-MODS					Total Non-MODS
	Outgoing	Incoming	Transit	Other	Breaks	
6610	0	0	0	0	0	0
6610	0	0	0	0	0	0
6610	0	0	0	0	0	0
6610	0	0	0	194	0	194
6620	0	0	0	1	0	1
6620	0	0	0	0	0	0
6620	0	0	0	0	0	0
6620	0	0	0	190	0	190
6630	0	0	0	12	0	12
6630	0	0	0	14	0	14
6630	0	0	0	1	0	1
6630	0	0	0	3,325	0	3,325
6640	0	0	0	0	0	0
6640	0	0	0	0	0	0
6640	0	0	0	0	0	0
6640	0	0	0	32	0	32
6650	0	0	0	0	0	0
6650	0	0	0	0	0	0
6650	0	0	0	0	0	0
6650	0	0	0	172	0	172
6660	0	0	0	0	0	0
6660	0	0	0	0	0	0
6660	0	0	0	0	0	0
6660	0	0	0	49	0	49
Grand Total	236,036	1,244,757	9,377	93,709	156,352	1,740,230

Attachment 2 - MPA/USPS - T12 - 2

**IOCS Dollars (000s)**

<b>Year</b>	<b>Activity Code</b>			<b>All Mail Proc. Costs</b>
	<b>6521</b>	<b>6522</b>	<b>6523</b>	
1994	1,432,277	0	935,106	11,461,458
1995	1,496,587	0	981,192	11,448,782
1996	1,635,727	0	1,071,751	11,824,711

**Activity Codes 6521 - 6523 Dollars as a Percentage  
of All Mail Processing Costs**

<b>Year</b>	<b>Activity Code</b>			<b>Total 6521-6523</b>
	<b>6521</b>	<b>6522</b>	<b>6523</b>	
1994	12.50%	0.00%	8.16%	20.66%
1995	13.07%	0.00%	8.57%	21.64%
1996	13.83%	0.00%	9.06%	22.90%

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

MPA/USPS-T12-3. Please refer to LR-H-219, Spreadsheet TW-7.

- a. Please confirm that 57 percent of grand total outgoing costs for direct mail codes and 67 percent of grand total incoming costs are for direct mail codes.
- b. Please confirm that the majority of outgoing sorts are performed during Tour 3 and the majority of incoming sorts are performed during Tour 1.
- c. Please confirm that the difference between the figures in part a. is statistically significant at a one percent confidence level.
- d. Suppose that a class of mail is totally dropshipped so that it avoids all outgoing sorts.
  - i. Should the cost for this class of mail include any costs for outgoing mixed-mail codes? If yes, why?
  - ii. Under your proposed methodology, would the cost for this class of mail mixed mail codes?

MPA/USPS-T12-3 Response.

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d.
  - (i) Yes. The hypothetical question hinges on how the "outgoing sort" is defined. The example appears to assume that "outgoing" sorts would be indicated by the IOCS basic function. I am informed that under the rules for determining basic function (see LR-H-49 at 136 and 144), the "totally dropshipped" mail would be expected to receive some processing which, when sampled, would be assigned the "outgoing" basic function. Therefore it would be perfectly appropriate to

7,8

Response of United States Postal Service Witness Degen  
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MPA/USPS-T12-4. Please refer to LR-H-219, Spreadsheet TW-3e.

- a. Please confirm that spreadsheet TW-3e shows that costs for IOCS activity codes 6420 and 6430 (Carriers Performing Office Work/Going to Vehicle and Carrier Checking In, Obtaining Accountable Mail or Keys, Checking Vehicle, Safety Meeting, respectively) for employees clocked into MODS mail processing operations constitute .5 percent of mail processing operating costs.
- b. If confirmed, please explain why C/S 3 Clerks and mailhandlers mail processing costs includes costs which IOCS identifies as being incurred for carrier activities.
- c. Please explain why city carriers are clocked into mechanical (e.g., FSM and LSM) and automated operations (e.g., OCR and BCS).

MPA/USPS-T12-4 Response.

- a. Not confirmed. The percentage of volume-variable costs distributed to the specified activity codes in TW-3e for all mail processing cost pools is approximately 0.5%, however the percentage for the MODS office group is 0.3%.
- b. The activity codes specified in part a apply to clerk/mailhandler as well as carrier activities. The use of "carrier" in the description is inaccurate. IOCS question 18 includes responses which correspond to these activity code descriptions, see LR-H-49 p. 79-80. Note that in previous versions of the Summary Description of USPS Development of Costs by Segment and Component, the description of these activity codes did not include "carrier."
- c. As explained in part b, the specified activity codes can be interpreted as clerk and mailhandler activities as well as carrier activities. Furthermore,

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

the IOCS tallies underlying the cost distribution in TW-3e are solely clerk and mailhandler tallies, as identified by the employee's roster designation code (variable F257). Thus there is no basis for concluding from TW-3e that carriers were clocked into the specified distribution operations.

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

MPS/USPS-T-12-5. Please refer to LR-H-219, Spreadsheet TW-3e.

- a. Please confirm that this spreadsheet shows that window and related office costs (activity codes 5020-5195 and 6000-6200) for Clerks and Mailhandlers clocked into mail processing operations constitute .44 percent of grand total Clerks and Mailhandlers cost, .53 percent of MODS facility Clerks and Mailhandlers cost, and .13 percent of Non-MODS facility Clerks and mailhandlers cost.
- b. Please explain why a clerk or mailhandler clocked into a MODS mail processing operation would perform window and related office activities.
- c. In light of your answer to part b., please provide an explanation of why clerks and mailhandlers at MODS facilities clocked into mail processing operations spend a higher percentage of their time performing window and related office activities than do clerks and mailhandlers at non-MODS facilities.
- d. What percentage of mail processing facilities have window operations?

MPA/USPS-T12-5 Response.

- a. Confirmed.
- b. *I cannot specify why the employee would not clock into the appropriate window service or other activity. However, the reason why the employee would perform the activity is presumably that the employee was instructed to do so by a supervisor.*
- c. It is not possible to make a comparison given the available data, since clerks and mailhandlers at non-MODS offices do not clock into mail processing operations. Mail processing tallies at MODS operations are identified primarily on the basis of the MODS operation the employee is clocked into. The sampled activity may differ from the clocked-in operation, as explained in my testimony, USPS-T-12, at 6. Note,

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

however, that more than half of the window-related activity costs at MODS facilities come from two cost pools: LD43 and LD44. The data indicate that employees working these operations are more likely to move to a window service operation without reclocking. Mail processing tallies at non-MODS offices are identified using the IOCS operation code, which identifies the employee's activity based on question 18. Therefore, most non-MODS tallies where the sampled activity is window-related will be assigned a window service operation code and be excluded from mail processing by the criteria in program NONMOD12, lines 22-25, LR-H-146.

- d. It is not possible to determine the extent to which processing and distribution and customer service facilities are co-located from the available data. MODS finance numbers identify the plant and customer service operations in a city separately but do not provide the necessary location information.

Response of United States Postal Service Witness Degen  
to Interrogatories of the Magazine Publishers of America

MPA/USPS-T12-6. Are clerks and mailhandlers at MODS offices clocked into a MODS operation when they are on lunch? If yes, please explain what operations employees are clocked into when they are on lunch.

MPA/USPS-T12-6 Response.

An employee on an approved break remains clocked into the pre-break operation. Otherwise the employee clocks out, in which case please see Exhibit 321 in LR-H-147.

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to Interrogatories of the Magazine Publishers of America

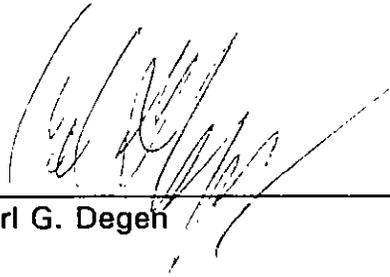
MPA/USPS-T12-7. Are there times when employees are at work but are not clocked into a MODS operation? If yes, please explain what the employee is doing while not checked into a MODS operation.

MPA/USPS-T12-7 Response.

No. Please note that if the employee is working but not clocked in, the employee will not be paid for the time.

**DECLARATION**

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



A handwritten signature in black ink, appearing to read 'Carl G. Degen', is written over a horizontal line.

Carl G. Degen

Date: 9-8-97

## 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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
September 4, 1997