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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No FROM THE COMMISSION OF THE SECRETARY

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-101) [ERRATA]

The United States Postal Service hereby provides its revised response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-101, filed on October 19, 2001. This revised response clarifies the original response, which was filed on November 2, 2001.

The 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

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RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-101. Parts of the following interrogatory were asked of USPS witness Mayo as OCA/USPS-T36-7. She responded that she was not aware of any processing centers with scanners that are not compatible with the signature capture program. The object of this interrogatory is to determine if the Postal Service has in its possession information of which witness Mayo was unaware. Therefore, please refer to an advisory report issued May 2, 2001 regarding Certified Mail Observations at the Los Angeles Processing and Distribution Center (Report Number AC-MA-01-002).

- (a) Please identify each and every Processing and Distribution Center (P&DC) that has scanning equipment that is not compatible with the Signature Capture Program. Include in your response the volume of Certified Mail impacted by the lack of compatible scanning equipment during FY 2000 and FY 2001. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (b) For each P&DC that employs the old scanning equipment identified in part "a" of this interrogatory, please explain whether or not the P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (c) Referring to part "b" of this interrogatory, for each and every P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (d) Please identify each and every non-P&DC Postal Service unit or facility that currently handles Certified Mail and uses the "old scanning equipment" that is incompatible with the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each reference used if one has not been previously filed in this docket.
- (e) For each non-P&DC that employs the old scanning equipment identified in part "d" this interrogatory, please explain whether or not the non-P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

- (f) Referring to part "e" of this interrogatory, for each and every non-P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (g) For each year, FY 2000 and FY 2001, please provide: (1) the number of Certified Mail transactions in which "old scanning equipment" was used; (2) the percentage of Certified Mail transactions in which "old scanning equipment" was used; and (3) information sufficient to show the revenue impact of using the "old scanning equipment" that was not linked to the national database. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

RESPONSE:

(a) The problem discussed in the audit report was not the lack of compatible scanning equipment, but rather the use of old scanning equipment instead of compatible equipment that was also available. An estimate of how much certified mail was impacted by the use of the old equipment is not available, but no certified mail was impacted by the lack of compatible equipment.

All P&DCs have compatible scanning equipment. For example, the facility studied in the audit report has two print workstations and now uses them daily for the signature capture program. Some P&DCs may also have the other scanning equipment for use in non-signature-capture functions. See page 4 of the audit report attached to the response to interrogatory DFC/USPS-2, which notes that the old equipment may be used for Registry dispatch functions.

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- (b) All P&DCs that deliver mail participate in the signature capture program, and have compatible equipment. They may continue to use other scanning equipment for non-signature-capture functions.
- (c) Not applicable. See parts a and b.
- (d) All non-P&DC sites are using compatible scanning equipment for the signature capture program. Some of these facilities might also use other scanning equipment for non-signature-capture functions.
- (e) All U.S. delivery locations, including Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands, participate in the signature capture program.
- (f) Not applicable. See parts d and e.
- (g) This information is not available.

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.

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 November 9, 2001