

UNITED STATES OF AMERICA
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, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-215-224)
November 14, 2001

Pursuant to Rules 25 through 28 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 OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,


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OCA/USPS-215. Please refer to USPS-LR-J-58, LR58ASP.xls.

- a. Refer to worksheets "SP Letters (detailed)" and "SP Letters (combined)." Please confirm that the volume for single-piece letters includes single-piece cards. If you do not confirm, please explain.
- b. Please provide worksheets "SP Letters (detailed)" and "SP Letters (combined)" for letters only (excluding cards).
- c. Please provide worksheets "SP Letters (detailed)" and "SP Letters (combined)" for cards only (excluding letters).
- d. Refer to the worksheet "SP Letters (combined)." Please confirm that the volume Total should be 43,018,464,782. If you do not confirm, please explain.

OCA/USPS-216. Please refer to USPS-LR-J-58, LR58PRE.xls.

- a. Refer to worksheets "Presort Letters (detailed)" and "Pre Letters (combined)." Please confirm that the volume for presort letters includes presort cards. If you do not confirm, please explain.
- b. Please provide worksheets "Presort Letters (detailed)" and "Pre Letters (combined)" for presort letters only (excluding presort cards).
- c. Please provide worksheets "Presort Letters (detailed)" and "Pre Letters (combined)" for presort cards only (excluding presort letters).

OCA/USPS-217. Please refer to USPS-LR-J-58, LR58AREG.xls.

- a. Refer to worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)." Please confirm that the volume for Regular letters includes Regular cards. If you do not confirm, please explain.
- b. Please provide worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)" for Regular letters only (excluding Regular cards).
- c. Please provide worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)" for Regular cards only (excluding Regular letters).

OCA/USPS-218. Please refer to USPS-LR-J-60, pages 46 and 81, column 2, "MODS Productivity."

- a. What factors explain a MODS Productivity for the Incoming CSBCS [Carrier Sequencing Bar Code Sorter] Secondary DPS [Delivery Point Sequence] (3 Pass) that is more than 3 times the MODS Productivity for the Incoming BCS [Bar Code Sorter] Secondary DPS (2 Pass)?
- b. What factors explain a MODS Productivity for the Incoming BCS Secondary DPS (2 Pass) that is more than 3 times the MODS Productivity for the P.O. Box Sort DPS?

OCA/USPS-219. Please refer to the testimony of witness Kingsley (USPS-T-39) at page 10, lines 11-12.

- a. Please describe the types of damage referred to in the testimony that occur to machinable and nonmachinable letter-shaped pieces during automated mail processing.

- b. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” may cause damage to subsequent machinable letter-shaped pieces during automated processing. If you do not confirm, please explain.
- c. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” adversely affect the throughputs of automated mail processing equipment. If you do not confirm, please explain.
- d. Please confirm that nonmachinable letter-shaped pieces that “impede the mail flow” and cause damage to subsequent machinable letter-shaped pieces render such letter-shaped pieces nonmachinable. If you do not confirm, please explain.
- e. Please describe the types of damage referred to in the testimony that occur to automated mail processing equipment caused by nonmachinable letter-shaped pieces.

OCA/USPS-220. Please confirm that 99.7 percent of First-Class single-piece letter-shaped pieces weigh less than three ounces. If you do not confirm, please provide the correct percentage under three ounces and cite the source.

OCA/USPS-221. Please confirm that 100 percent of First-Class presort letter-shaped pieces weigh less than three ounces. If you do not confirm, please provide the correct percentage under three ounces and cite the source.

OCA/USPS-222. Please refer to the response to OCA/USPS-165(e-f), which states that "A piece at the maximum allowable [card] dimensions still weighs less than one ounce."

- a. Please confirm that a card at the maximum allowable dimensions weighs less than one-half ounce. If you do not confirm, please explain.
- b. Please provide the maximum weight for a card at the maximum allowable dimensions.

OCA/USPS-223. For FYs 1993 through 2002, please provide a tabulation of

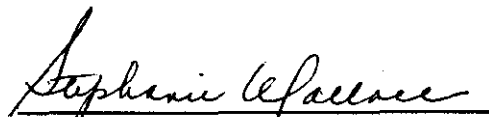
- a. inventory of mail processing equipment by witness Bozzo's site identification number; please include dates of purchase, installation, entry into regular service, and retirement
- b. volumes (TPF, TPH, and FHP) by witness Bozzo's site identification number by postal quarter (PQ) and accounting period (AP) by cost pool (as that term is used by witness Bozzo);
- c. workhours by witness Bozzo's site identification number by PQ and AP by cost pool (as that term is used by witness Bozzo); and
- d. PCN equipment categories for each of the capital indexes in the data set reg9300.xls in LR-J-56.

OCA/USPS-224. For FYs 1993 through 2002, please provide the planned and actual FHP volume by AP and the planned and actual workhours by AP by witness Bozzo's site identification number for each MODS cost pool used in the variability analysis. (See

MODS handbook M-32, sections 432.2 and 432.4, December 1, 1987, for discussion of the planned variables.)

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 Rule 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
November 14, 2001