

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

RESPONSES OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-167-171)

The United States Postal Service hereby provides the responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-167-171, filed on October 31, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 14, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
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OCA/USPS-167

Please refer to the response to OCA/USPS-63.

- a. Refer to the response to part a. Please confirm that "letters with insufficient addresses" generally enter the postal system as collection mail. If you do not confirm, please explain.
- b. Refer to the response to parts b. and d.
 - i. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered with the Postal Service via "Retail acceptance personnel;"
 - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of total First-Class letter-shaped mail that is entered via "Retail acceptance personnel;"
 - iii. For the base year and test year, please provide the total volume, or an estimate of the total volume, of mail entered via "Retail acceptance personnel."
- c. Refer to the response to parts b. and d.
 - i. Please identify methods other than "Retail acceptance personnel" by which First-Class letter-shaped mail is entered with the Postal Service;
 - ii. Please provide the base year and test year volume, or an estimate of the volume, of First-Class letter-shaped mail that is entered via each of the methods identified in subpart i.
- d. Refer to the response to part b. Please confirm that "culling equipment" refers to the Advanced Facer Cancellor System (AFCS). If you do not confirm, please explain.
- e. Refer to the response to part b. Please confirm that there is no feature of the AFCS specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- f. Refer to the response to part b. Please confirm that there is no feature of any other mail processing equipment specifically designed to separate letter-shaped pieces that fail to meet the aspect ratio requirements (DMM section C810.2.2.) from the letter-shaped mailstream. If you do not confirm, please explain.
- g. Refer to the response to part b. Please confirm that there is no feature of any mail processing equipment specifically designed to separate letter-shaped pieces that are subject to the proposed non-machinable surcharge from the letter-shaped mailstream. If you do not confirm, please explain.
- h. Refer to the response to part b. In what mail processing operation are "culling belts" located? Are culling belts a part of, or separate from, any mail processing equipment? Please explain how culling belts separate letter-shaped pieces destined for manual processing from the letter-shaped mailstream.
- i. Refer to the response to part b. Please confirm that culling belts are not capable of separating letter-shaped pieces subject to the proposed non-

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- machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how the culling belts accomplish this separation.
- j. Refer to the response to part b. Please confirm that as "mailhandlers cull manual letters from the collection mailstream," they will not separate letter-shaped pieces subject to the proposed non-machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain.
- k. Refer to the response to part b., where it states that letter-shaped pieces "can be diverted to the manual mailstream once . . . sorted to reject stackers." Please confirm that the automation equipment will not separate letter-shaped pieces subject to the proposed non-machinable surcharge from other manual letter-shaped pieces. If you do not confirm, please explain how this separation is to be accomplished by the automation equipment.
- l. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that full trays of manual letters from bulk mailers will be marked for manual processing pursuant to DMM section M130.1.5. If you do not confirm, please explain.
- m. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that the full trays of manual letters arriving from other processing facilities will not be separated into trays of non-machinable letter-shaped pieces subject to the proposed surcharge and trays of other manual letter-shaped pieces. If you do not confirm, please explain.
- n. Refer to the response to part b., where it states "As letter trays arrive from bulk mailers or other processing facilities, mailhandlers separate full trays of manual letters from automation compatible letters." Please confirm that within the full trays of manual letters arriving from other processing facilities, the letters will not be separated into non-machinable letter-shaped pieces subject to the proposed surcharge and other manual letter-shaped pieces. If you do not confirm, please explain.
- o. Refer to the response to part c., where it states that "the Test Year After Rates volumes include an estimate of the additional pieces meeting the proposed non-machinable definition." What proportion of the difference between the Base Year and Test Year After Rates volumes for nonstandard/non-machinable First-Class Single-Piece and Nonautomated Presort Letters is non-machinable (as opposed to nonstandard)?
- p. Refer to the response to part d. Where nonstandard/non-machinable letter-shaped pieces are not identified by "Retail acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing and determined to be non-machinable and subject to the proposed non-machinable surcharge. Please explain how the determination is to be made.
- q. Refer to the response to part d. Where nonstandard/non-machinable letter-shaped pieces are not identified by "Business Mail Entry Unit (BMEU)

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acceptance personnel," please identify every operation (e.g., Entry Activities; Outgoing RBCS; Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces are separated from the letter-shaped mailstream for manual processing and determined to be non-machinable and subject to the proposed non-machinable surcharge. Please explain how the determination is to be made.

- r. Refer to the response to parts f. – j., where it states that "Pieces originally determined to be machinable at the retail window or BMEU but determined subsequently to be non-machinable during processing, are intended to be treated similar to the existing nonstandard surcharge pieces." Please confirm that some "existing nonstandard surcharge pieces" are currently processed successfully through the entire automated mail processing system. If you do not confirm, please explain.
- s. Refer to the response to parts f. – j.
 - i. Please provide the base year volume, or an estimate of the volume, of "existing nonstandard surcharge pieces" that are currently processed successfully through the entire automated mail processing system;
 - ii. For the base year, please provide the percent, or an estimate of the percent, of "existing nonstandard surcharge pieces" that are currently processed successfully through the entire automated mail processing system.
- t. Refer to the response to parts f. – j., where it states that "processing personnel assume the pieces have been appropriately charged at entry and will not be marked 'Postage Due.'" Please confirm that only retail and BMEU acceptance personnel will mark Postage Due on letter-shaped pieces subject to the proposed non-machinable surcharge. If you do not confirm, please identify every operation (e.g., Entry Activities; Outgoing Remote Bar Code Sorter (RBCS); Outgoing Primary, Carrier Delivery, etc.) where letter-shaped pieces will be marked Postage Due.
- u. Refer to the response to parts f. – j., where it states that "processing personnel assume the pieces have been appropriately charged at entry and will not be marked 'Postage Due.'" Please confirm that if letter-shaped pieces subject to the proposed non-machinable surcharge are not identified at the retail window or BMEU, such letter-shaped pieces will not pay the proposed non-machinable surcharge. If you do not confirm, please explain.
- v. Refer to the response to parts f. – j.
 - i. Please provide the base year and test year volume, or an estimate of the volume, of nonstandard/non-machinable letter-shaped mail that is marked Postage Due;
 - ii. For the base year and test year, please provide the percent, or an estimate of the percent, of nonstandard/non-machinable letter-shaped mail that is marked Postage Due;
 - iii. Please provide the base year and test year volume, or an estimate of the volume, of manual letter-shaped mail that is marked Postage Due;
 - iv. For the base year and test year, please provide the percent, or an estimate of the percent, of manual letter-shaped mail that is marked Postage Due.

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- w. Refer to the response to parts f. – j. Please confirm that because not all nonstandard/non-machinable letter-shaped pieces will be identified by retail and BMEU acceptance personnel, the Test Year After Rates revenue estimates for the proposed non-machinable surcharge are overstated. If you do not confirm, please explain.

Response:

- (a) Not confirmed. Though many do enter through the collection mailstream, many also enter as part of bulk mailings.
- (b) i. – iii. Postal data collection systems do not capture whether a stamped First-Class Mail letter was dropped in a collection box, picked up by the carrier, or handed across a retail counter. Therefore, data indicating how First-Class Mail letters are entered are not collected, and information on which to base an estimate is not available.
- (c) i. Other methods by which First-Class letter-shaped mail may be entered include: by collection boxes, carrier pick-ups at delivery points, collection routes, bulk mail entry units, or acceptance at a mailer's plant, where the mail is then loaded onto postal transportation through a plant load agreement.
- ii. See response to subpart (b) above.
- (d) Not confirmed. Culling equipment refers to the Dual Pass Rough Cull equipment as well as the culling belts that are staffed by mailhandlers that precede the AFCS equipment in the mail prep operation.
- (e) Confirmed.
- (f) Confirmed.
- (g) It can be confirmed that mail processing equipment has not been designed and, consequently, will not be relied upon to separate letter-shaped pieces that are subject to the proposed non-machinable surcharge based on number of

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different criteria. However, if pieces subject to the proposed non-machinable surcharge get fed into the letter mail processing equipment, they will most likely jam the machine (*e.g.*, because they are too rigid) or be damaged (*e.g.*, because they contain an enclosed pen or are too flimsy).

- (h) Culling belts are located in the mail prep operation, also known as the "010" operation. Culling belts are typically separate from mail processing equipment; however, the feed end of AFCS equipment is also designed to mechanically cull pieces that are too thick, tall, or long in case they were missed by the Dual Pass Rough Cull or on the manual culling belts. Manual pieces exceeding the maximum dimensions will be mechanically culled by the Dual Pass Rough Cull or the AFCS. Other manual pieces will be culled on the manual culling belts. For example, square, flimsy, and wooden postcards could be culled, then hand cancelled, and finally sent to a manual operation.
- (i) Not confirmed. See response to subpart (h) above.
- (j) Confirmed.
- (k) Confirmed. For example, a flimsy postcard can be rejected to a stacker with *other unreadable manual letters, if it does not jam the machine first.*
- (l) Not confirmed. Presorted letters that are marked for manual processing pursuant to DMM M130.1.5 likely have certain automation-compatible characteristics and are likely to be processed on automated equipment, unless the customer specifically requests manual processing. Though not restricted from using the marking, it was not intended to be required for use by mailers of pieces that obviously require manual processing.

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- (m) Confirmed. Non-machinable letter-shaped pieces subject to the proposed surcharge will be processed together with other manual letter-shaped pieces at processing facilities.
- (n) See response to subpart (m) above.
- (o) Please see to USPS-T-29, Attachment C, pg. 1. The Test Year Before Rates volume includes only the nonstandard pieces and the Test Year After Rates includes both the nonstandard and non-machinable.
- (p) Letter-shaped pieces are separated for manual processing at the mail prep and opening unit operations as well as every automated letter operation prior to dispatch to the delivery units. In the mail prep and opening unit operations, mailhandlers will separate manual letters at the culling belts or full trays of manual letters arriving from other facilities or through the BMEU. At automation operations (e.g. DBCSs, MPBCSs, etc.), the feeder will cull manual letters before they get fed on the machine and the sweeper will pull if jammed or damaged in the reject stacker(s).
- (q) See response to sub-part (p) above.
- (r) Not confirmed. See USPS-T-22, page 30 at lines 9-19. Even though a barcode may appear on a non-standard piece, that does not imply that it was processed successfully through the entire automated system.
- (s) The Postal Service does not have data responsive to this request.
- (t) Not confirmed. As stated in the response to parts (f – j), it can be confirmed that bulk mailings with permit imprints do not indicate the postage paid on the piece, and therefore, processing personnel assume the pieces have been appropriately charged at entry and will not be marked "Postage Due". For these

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mailings, BMEU acceptance personnel are responsible for collecting the proper postage upon acceptance. Clerks and carriers also mark pieces postage due.

- (u) Not confirmed. It can be confirmed that, for bulk mailings with permit imprints that do not indicate the postage paid on the piece, BMEU acceptance personnel will be solely responsible for ensuring that the proper postage is paid prior to acceptance. However, processing personnel (e.g., supervisors, nixie clerks, etc.) and carriers handling nonstandard/non-machinable mailings could mark the piece postage due and the surcharge would subsequently be paid.
- (v) The Postal Service does not have data responsive to this request.
- (w) Not confirmed. Test-year-after-rates volumes are estimated based on 1997 Mail Characteristics Study data which estimate the number of letter-shaped pieces that are non-machinable. As noted in USPS-T-29 at page 24, footnote 15, "[t]he proportion used for the volume of non-machinable mail is based solely on the physical characteristics of the mail piece. Some additional (unquantified) volume would be subject to the non-machinable surcharge as a result of manual processing operations." In addition, errors in postage payment will include overpayment of postage as well as underpayment of postage.

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OCA/USPS-168

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded, and weighs two ounces. However, one group paid a First-Class rate and the other paid a Standard Mail Regular rate.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same Advanced Flat Sorting Machine (AFSM) 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each flat-shaped piece in each group weighed 3 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 3 ounces.
- f. Assume the same facts above and in part a., except that each flat-shaped piece in each group weighed 4 ounces. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group weighed 4 ounces.
- g. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a. through f. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- h. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the two groups were processed on a Flat Sorting Machine (FSM) 881 and a Flat Sorting Machine (FSM) 1000, respectively. If you do not confirm, please explain.
- j. Please confirm that the responses to parts a. through i. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

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RESPONSE:

- (a) Not confirmed. All of the factors spelled out in the response to OCA/USPS-145, subpart (a) also apply to flat mail and the AFSM 100. Further, it should be noted that First-Class Mail and Standard Mail flats are unlikely to be identical in every respect. Many Standard Mail flats are catalogs with bound edges, while most First-Class Mail flats are enveloped. Though not specifically studied, these differences are likely to have an impact on the AFSM 100 operation.
- (b) Based on the differences spelled out in OCA/USPS-145, subpart (a), which also apply to this scenario, and absent testing, this cannot be confirmed. Similar to letter automation operations, these differences would likely impact productivity.
- (c) Not confirmed. See response to OCA/USPS-145, subpart (c).
- (d) Based on the responses to parts (a - c) above, not confirmed.
- (e - g) The responses for subparts (a - d) would be the same as above when the additional criteria spelled out in subparts (e - g) are individually factored in.
- (h) Not confirmed. See response to OCA/USPS-145, subpart (h), This response is also applicable to flat mail processing.
- (i) Confirmed.
- (j) Not Confirmed. See response to OCA/USPS-145, subpart (i). This response is also applicable to flat mail processing.

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OCA/USPS-169

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a First-Class rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

RESPONSE:

- (a) Absent empirical data or a specific study, this cannot be confirmed. However, using the example given and the fact that there are no mechanical differences in

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how the AFSM 100 feeds, transports, and sorts pieces of different weights, there should be no significant difference in the throughputs and velocities.

- (b) Not confirmed. See response to subpart (a) above.
- (c) Confirmed.
- (d) Based on the responses to subparts (a & b) above, not confirmed.
- (e) The responses for subparts (a – d) would be the same as above when the additional criterion spelled out in subpart (e) is also factored in.
- (f) Not confirmed. The costs would differ due to mail pieces that are rejected on the first pass. In addition, generally a different number of stackers would be used on two passes.
- (g) Confirmed.
- (h) See response to OCA/USPS-161, subpart (h). This response is also applicable to flat mail processing.

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OCA/USPS-170

Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible, barcoded and paid a Standard Mail Regular rate. However, one group weighs two ounces and the other group weighs three ounces.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.

RESPONSE:

(a – g) See responses to OCA/USPS-169, subparts (a – g). These responses would also apply to Standard Mail.

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(h) Not confirmed. Although the hypothetical presented in this question assumes only Standard mail, the magnitude of these volume figures introduces service considerations similar to those discussed in the response to OCA/USPS-161(h).

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OCA/USPS-171 Please refer to the response to OCA/USPS-44(b). Assume two groups of 10,000 flat-shaped pieces are identical in every respect. More specifically, each flat-shaped piece in each group is automation compatible and barcoded. However, one group weighs two ounces and paid a First-Class rate, and the other group weighs three ounces and paid a Standard Mail Regular rate.

- a. Assume further that the two groups of flat-shaped pieces are processed in one pass on the same AFSM 100. Please confirm that the throughputs and velocities for that pass would be the same for each group. If you do not confirm, please identify and describe all factors that would cause the throughputs and velocities for each group to differ.
- b. Assume the same facts above and in part a. Please confirm that the productivities for each group would be the same. If you do not confirm, please identify and describe all factors that would cause the productivities for each group to differ.
- c. Assume the same facts above and in part a. Please confirm that the wage rates for processing each group would be the same. If you do not confirm, please identify and describe all factors that would cause the wage rates for each group to differ.
- d. Assume the same facts above and in part a. Please confirm that the total cost and the unit cost for processing each group on the AFSM 100 would be the same. If you do not confirm, please identify and describe all factors that would cause the total and unit costs for each group to differ.
- e. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please answer parts a., b., c., and d. assuming that each flat-shaped piece in each group is processed in two passes on the same AFSM 100.
- f. Assume the same facts above and in part a., except that each group of flat-shaped pieces is processed in two passes on the same AFSM 100. Please confirm that the total cost and the unit cost for processing each group would be twice the cost of each group if processed in one pass on the same AFSM 100. If you do not confirm, please explain.
- g. Please confirm that the responses to parts a. through f. would be the same where the two groups were processed on a FSM 881 and a FSM 1000, respectively. If you do not confirm, please explain.
- h. Please confirm that the responses to parts a. through g. would be the same where the two groups consisted of 100,000, 1 million, and 10 million flat-shaped pieces, respectively. If you do not confirm, please explain.
- i. Please confirm that the responses to parts a. through h. would be the same where the group that paid the First-Class rate weighed three ounces and the group that paid the Standard Mail Regular rate weighed two ounces. If you do not confirm, please explain.

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RESPONSE:

(a - g) See responses to OCA/USPS-168, subparts (a – d) & (g - i); and OCA/USPS-169, subparts (a – g).

(h) Not confirmed. See response to OCA/USPS-145, subpart (i). This response would also apply to flat mail processing.

(i) Confirmed.

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.



Joseph K. Moore

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November 14, 2001