

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
WITNESS LINDA A. KINGSLEY
(OCA/USPS-T39-1-8)
November 16, 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-T39-1. Please refer to the response to OCA/USPS-145.

- a. Do you agree with the response of the Postal Service to OCA/USPS-145(a-i)? If you do not agree with any response, please provide your response. If you do agree, please reconcile your response with the response to UPS/USPS-T39-3.
- b. Refer to the response to part a.
 - i. Please define "throughput."
 - ii. Please provide a numeric example showing the calculation of throughput. If there are alternative calculations for throughput, please show these alternative calculations.
 - iii. Please identify the calculation of throughput from subpart ii. used, or used predominately, by the Postal Service.
 - iv. Does the calculation of throughput differ based upon the type of automated mail processing equipment? If yes, show the calculation of throughput for each type of automated mail processing equipment
- c. Refer to the response to part a., where it states "there are inherent differences in piece characteristics between First-Class Mail and Standard Mail that affect throughput." Please confirm that the phrase "inherent differences in piece characteristics" refers to physical characteristics. If you do not confirm, please explain.
- d. Refer to the response to part a., where it states "there are inherent differences in piece characteristics between First-Class Mail and Standard Mail that affect throughput."

- i. Please identify all inherent differences in mailpiece characteristics for automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce that affect throughput when processed on the Delivery Bar Code Sorter (DBCS), the Mail Processing Bar Code Sorter (MPBCS), and the Carrier Sequence Bar Code Sorter (CSBCS).
- ii. Please indicate whether each inherent difference in mailpiece characteristics identified in subpart i. with respect to automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce has a positive or negative impact on throughput when processed on the DBCS, MPBCS and CSBCS. Please explain the basis for indicating any positive or negative impact.
- iii. Please separately rank the positive and negative impacts indicated in subpart ii. from most important to least important for the DBCS, MPBCS and CSBCS.
- iv. Please identify which (if any) of the positive and negative impacts from subpart iii. have been specifically estimated, quantified, or modeled by the Postal Service in the calculation of throughputs with respect to automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce processed on the DBCS, MPBCS and CSBCS.
- e. Refer to the response to part a., where it states that "First-Class Mail and Standard Mail are sometimes processed on different sort plans." Please confirm

that the phrase "different sort plans" refers to the first pass in Delivery Point Sequencing (DPS) on the DBCS and MPBCS. If you do not confirm, please explain.

- f. Refer to the response to part a.
 - i. Please identify any factors (other than inherent differences in mailpiece characteristics) related to automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce that affect throughput when processed on the DBCS, MPBCS and CSBCS.
 - ii. Please indicate whether each factor identified in subpart i. with respect to automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce has a positive or negative impact on throughput when processed on the DBCS, MPBCS and CSBCS. Please explain the basis for indicating any positive or negative impact.
 - iii. Please separately rank the positive and negative impacts indicated in subpart ii. from most important to least important for the DBCS, MPBCS and CSBCS.
 - iv. Please identify which (if any) of the positive and negative impacts from subpart iii. have been specifically estimated, quantified, or modeled by the Postal Service in the calculation of throughputs with respect to automation compatible, barcoded First-Class Mail and Standard Mail letter-shaped pieces weighing one ounce processed on the DBCS, MPBCS and CSBCS.

- g. Refer to the response to part a. To what extent are automation compatible, barcoded "First-Class Mail and Standard Mail [letter-shaped pieces weighing one ounce] sometimes processed on different sort plans" on the DBCS, MPBCS, and CSBCS? Please provide the frequency, or an estimate of the frequency, with which this occurs for DBCS, MPBCS, and CSBCS processing.
- h. Refer to the response to part a. To what extent do "The First-Class sort plans [for automation compatible, barcoded letter-shaped pieces weighing one ounce] likely involve the use of more stackers" as compared to automation compatible, barcoded Standard Mail letter-shaped pieces weighing one ounce? Please provide the frequency, or an estimate of the frequency, with which this occurs for DBCS, MPBCS, and CSBCS processing.
- i. Refer to the response to part a., where it states that "First-Class Mail and Standard Mail are sometimes processed on different sort plans." Would the use of different sort plans for automation compatible, barcoded First-Class letter-shaped pieces weighing one ounce vs. automation compatible, barcoded Standard Mail letter-shaped pieces weighing one ounce produce a small or large impact on the throughputs of the DBCS, MPBCS, and CSBCS? Please explain and provide copies of any studies, reports, other documents, or communications that support the explanation.
- j. Refer to the response to part a. In the absence of "any testing conducted to quantify the impacts of these differences on equipment throughputs," please provide copies of any studies, reports, other documents, or communications that

discuss the impact of different First-Class Mail and Standard Mail sort plans on throughput.

- k. Refer to the response to part a. Please confirm that it is possible for two groups of 10,000 automation compatible, barcoded letter-shaped pieces weighing one ounce to be identical in every respect (including content and mailing addresses), except that one group paid a First-Class rate and the other paid a Standard Mail Regular rate. If you do not confirm, please explain.
- l. Refer to the response to part a. Would your response to the hypothetical posed in part a. change if the group that paid the First-Class rate were entered in bulk? Please explain.
- m. Refer to the response to part b. Please confirm that “the differences spelled out in part (a)” refer to the “inherent differences in piece characteristics between First-Class Mail and Standard Mail.” If you do not confirm, please explain.
- n. Refer to the response to part b. “[A]bsent testing,” please provide copies of any studies, reports, other documents, or communications that discuss the impact of different First-Class Mail and Standard Mail sort plans on productivities.
- o. Refer to the response to part c. Please confirm that it is possible for two groups of 10,000 automation compatible, barcoded letter-shaped pieces weighing one ounce and identical in every respect (including content and mailing addresses), with one group paying a First-Class rate and the other paying a Standard Mail Regular rate, to be processed on the same tour. If you do not confirm, please explain.

- p. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-145(a). Please quantify the effect on the unit cost of automation compatible, barcoded First-Class and Standard Mail letter-shaped pieces weighing one ounce caused by the changes in throughput cited in response to part a. when such mail is processed on the DBCS. Please quantify the effect on the unit cost when such mail is processed on the MPBCS and CSBCS.
- q. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-145(b). Please quantify the effect on the unit cost of automation compatible, barcoded First-Class and Standard Mail letter-shaped pieces weighing one ounce caused by the changes in productivity cited in response to part b. when such letter-shaped pieces are processed on the DBCS. Please quantify the effect on the unit cost when such letter-shaped pieces are processed on the MPBCS and CSBCS.
- r. Refer to the response to part d. Refer also to the hypothetical posed in OCA/USPS-145(c). Assuming the automation compatible, barcoded First-Class and Standard Mail letter-shaped pieces weighing one ounce are processed in one tour, please quantify the effect on the unit cost when such letter-shaped pieces are processed on the DBCS. Please quantify the effect on the unit cost when such letter-shaped pieces are processed on the MPBCS and CSBCS.

OCA/USPS-T39-2. Please refer to the response to OCA/USPS-149, parts d and h..

- a. Do you agree with the response of the Postal Service to OCA/USPS-149? If you do not agree with any response thereto, please provide your response.

- b. Refer to the response to part d. Please confirm that the identical mail flow densities for First-Class and Standard Regular letter-shaped pieces assumes, for purposes of USSP-LR-J-60, that the sort schemes and mail processing operations for First-Class and Standard Regular letter-shaped pieces are the same. If you do not confirm, please explain.
- c. Refer to the response to part d. Please confirm that the identical marginal volume variable productivities for First-class and Standard Regular letter-shaped pieces assumes, for purposes of USSP-LR-J-60, that the costs for First-class and Standard Regular letter-shaped pieces undergoing the same mail processing operations are the same. If you do not confirm, please explain.

OCA/USPS-T39-3. Please refer to the response to OCA/USPS-165(a), where it states that "experience in operations indicates that cards jam less frequently than letters."

- a. Do you agree with the response of the Postal Service to OCA/USPS-165? If you do not agree with any response thereto, please provide your response.
- b. Please provide the frequency, or an estimate of the frequency, of jams for automation compatible, barcoded cards weighing one ounce and automation compatible, barcoded letters weighing one ounce for the DBCS, MPBCS, and CSBCS.

OCA/USPS-T39-4. Please refer to the response to OCA/USPS-167.

- a. Do you agree with the response of the Postal Service to OCA/USPS-167? If you do not agree with any response thereto, please provide your response.

- b. Refer to the response to part l. Please confirm that full trays of manual letters from bulk mailers marked for manual processing pursuant to DMM M130.1.5 will not be separated into trays of nonmachinable letter-shaped pieces subject to the proposed surcharge and trays of other manual letter-shaped pieces. If you do not confirm, please explain.
- c. Refer to the response to part o., where it states that "The Test Year Before Rates volume includes only the nonstandard pieces and the Test Year After Rates [volume] includes both the nonstandard and non-machinable [pieces]." For the Test Year After Rates, please provide volume of pieces that are nonstandard and the volume of pieces that are nonmachinable. Show all calculations.
- d. Refer to the response to part p. Please confirm that neither the feeder nor the sweeper will separate nonmachinable letter-shaped pieces subject to the proposed surcharge from other manual letter-shaped pieces. If you do not confirm, please explain.
- e. Refer to the response to part p. Please confirm that nonmachinable letter-shaped pieces subject to the proposed surcharge will not be marked "Postage Due" by the feeder or the sweeper. If you do not confirm, please explain.
- f. Refer to the response to part r., which states that "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." Is it the Postal Service's position that every nonstandard (current definition) piece is "captured" during automated mail processing operations? Please explain.

- g. Refer to the response to part u. Please identify all "processing personnel" by job title that have, or could have, responsibility for handling and processing manual letter-shaped pieces.
- h. Refer to the response to part u. Please identify the "processing personnel" identified in part f. above by job title that have responsibility for marking "Postage Due" on nonstandard/nonmachinable letter-shaped pieces subject to the proposed surcharge. Please provide any documentation assigning responsibility, or providing instruction, to the identified processing personnel that supports any claimed identity.

OCA/USPS-T39-5. Please refer to LR58ASP.xls, sheet "volume&lbs."

- a. Please confirm that 74.99 percent of single-piece First-Class letter-shaped pieces weigh 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 19.93 percent of single-piece First-Class letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

OCA/USPS-T39-6. Please refer to LR58PRE.xls, sheet "volume&lbs."

- a. Please confirm that 38.01 percent of presorted First-Class letter-shaped pieces weigh 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 59.30 percent of presorted First-Class letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

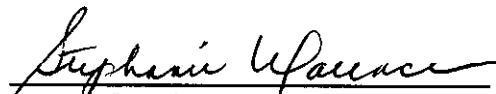
OCA/USPS-T39-7. Please refer to LR58AREG.xls, sheet "volume&lbs."

- a. Please confirm that 35.00 percent of Standard Regular letter-shaped pieces weigh 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 48.48 percent of Standard Regular letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

OCA/USPS-T39-8. Please refer to the response to the following interrogatories: OCA/USPS-146, 147, 162, 163, 166, and 168-171. Do you agree with the response of the Postal Service to interrogatories listed above? If you do not agree with any response thereto, please provide your response.

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 16, 2001