

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOZZO
TO OCA INTERROGATORY OCA/USPS -172,
REDIRECTED FROM THE POSTAL SERVICE
(November 16, 2001)

The United States Postal Service hereby provides the response of witness Bozzo to the following interrogatories of the OCA: OCA/USPS-172, filed on November 2, 2001, and redirected from the Postal Service. The interrogatory is stated verbatim and is followed by the response. The library reference cited in the response has been delayed in transmission because of the size of the files, but will be filed upon arrival.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

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November 16, 2001

Response of United States Postal Service Witness Bozzo
To Interrogatories of the Office of the Consumer Advocate
(Redirected from the United States Postal Service)

- OCA/USPS-172. For FYs 1993 through 2002, please provide
- a. an inventory of mail processing equipment at each Processing and Distribution Center (P&DC), Processing and Distribution Facility (P&DF), and Bulk Mail Center (BMC); please include date of purchase, date of installation, and date of entry into full routine service;
 - b. volumes by postal quarter (PQ) and accounting period (AP) by plant (*i.e.*, each individual P&DC, P&DF, and BMC) by mail processing cost pool; and
 - c. workhours by PQ and AP by plant (*i.e.*, each individual P&DC, P&DF, and BMC) by mail processing cost pool.

OCA/USPS-172 Response.

- a. The available data will be provided in USPS-LR-J-179. Please note that the Postal Service's data systems record the year of acquisition of pieces of equipment, but not the "date of installation" or "date of entry into full routine service."
- b.-c. The requested data for non-BMC plants will be provided in USPS-LR-J-179. In order to ensure that the operation groups are consistently defined over the period covered by the request, the MODS data have been mapped in the same manner as the MODS data provided in LR-J-56. Volumes and workhours are not available by cost pool for BMCs, though note that the workhour and workload data for the BMC operation groups analyzed by Prof. Bradley in Docket No. R97-1 are available in Docket No. R97-1, USPS-LR-H-148.

DECLARATION

I, A. Thomas Bozzo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A. Thomas Bozzo

Dated: 11-16-01

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.



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